



Part 2A of Form ADV: Firm Brochure

Item 1: Cover Page

March 2017

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This Brochure provides information about the qualifications and business practices of Financial Insights, Inc. If you have any questions about the contents of this Brochure, please contact us at 253-627-6010 or ali@financialinsights.net. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Financial Insights, Inc. also is available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. Our firm's CRD number is 108797.

Please note that the use of the term "registered investment adviser" and description of Financial Insights, Inc. and/or our associates as "registered" does not imply a certain level of skill or training. You are encouraged to review this Brochure and Brochure Supplements for our firm's associates who advise you for more information on the qualifications of our firm and our employees.

Item 2: Material Changes

Financial Insights, Inc. is required to advise you of any material changes to the Firm Brochure ("Brochure") from our last annual update.

The material changes in this brochure from the last annual updating amendment of Financial Insights on March 28, 2016 are described below. Material changes relate to Financial Insights' policies, practices or conflicts of interests.

- Financial Insights no longer offers sub advisory services through Yellowstone Partners.
- Financial Insights has updated Item 4.
- Financial Insights has updated Item 5.

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Item 4: Advisory Business

Financial Insights, Inc. is an SEC-registered investment advisor with its principal place of business located in Tacoma, Washington. Financial Insights, Inc. began conducting business as a registered investment advisor in 1984. Dorothy A. Lewis is Financial Insights, Inc.'s founder/owner and Alexandria A. Criss is a shareholder.

Financial Insights, Inc. offers a range of investment advisory and financial planning services, which include fee only investment management, comprehensive financial planning, and account review & monitoring.

Description of the Types of Advisory Services We Offer

Financial Insights, Inc. offers the following advisory services to our clients:

Financial Planning Services:

We offer advice in the form of comprehensive financial planning. Clients engaging us to provide this service will receive a written report, presenting the client with a detailed financial plan designed to assist him/her to achieve his/her stated financial goals and objectives.

In general, the financial plan will address any or all of the following areas of concern:

- ***Business:*** Assist business owner with retirement planning and cash flow analysis.
- ***Charitable Gifting:*** Assist client with yearly gifting strategy.
- ***Death & Disability:*** Review of cash needs at death, income needs of surviving dependents, estate planning and disability income analysis.
- ***Education:*** Review of education IRAs, financial aid, 529 plans, grants and general assistance in preparing to meet dependent's continuing educational needs through development of an education plan.
- ***Estate:*** Assistance in assessing and developing long-term strategies, including as appropriate, living trusts, wills, tax strategies, powers of attorney, asset protection plans, nursing homes, assisted living environments, and Medicaid and elder law, while working closely with the estate planning attorney.
- ***Insurance:*** Review of existing policies to ensure proper coverage for life, health, disability, long-term care, home and auto. Financial Insights, Inc. receives commissions for insurance related products.
- ***Investments:*** Analysis of investment holdings including employer plans, stock options, and personal investment accounts in relation to stated goals.
- ***Personal:*** Review of current and future financial/life goals, family records, cash flow, and net worth.
- ***Retirement:*** Analysis of current strategies and investment plans to help the client determine whether they are likely to achieve his or her retirement goals.
- ***Tax Analysis:*** Review of income tax to include planning, current and future years. Financial Insights, Inc. will illustrate the impact of various investments on a client's current income tax and future tax

liability as we work closely with the client's tax advisor.

We gather necessary information through in-depth personal interviews. Information gathered includes a client's current financial status, tax status, future goals, return objectives and attitudes towards risk. Related documents supplied by the client are carefully reviewed, including a questionnaire completed by the client, followed by preparation of a written plan. Should a client choose to implement the recommendations contained in the plan, Financial Insights, Inc. suggests that the client work closely with his/her attorney, accountant and insurance agent. Implementation of financial planning recommendations is entirely at the client's discretion.

Financial planning recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company and our clients are not bound to follow our suggestions.

Investment Advisory Services:

We provide Investment Advisory Services to clients based on the individual needs of each client. Through personal discussions in which the client's goals and objectives are established based on his/her particular circumstances, Financial Insights, Inc. assesses a client risk tolerance to guide the development and management of the client's portfolio. Financial Insights, Inc. will manage portfolio management services accounts, directly or through a sub advisor (see details below), on a discretionary or non-discretionary status based on the client's preference. Account supervision is guided by the stated objectives of the client, which are the following strategies: Very Conservative, Conservative, Moderate, Aggressive, and Very Aggressive.

Depending on the investment objectives of the client and the terms of the engagement, Financial Insights, Inc. will create a portfolio. The types of securities used to create the client's portfolio will generally consist of one or more of the following: individual equities, bonds, CD's no-load or load-waived mutual funds or exchange-traded funds (ETFs) and other investment products. Financial Insights, Inc. will allocate the client's assets among various investments, taking into consideration the overall management style selected by the client. Mutual funds, individual equities, municipal, and taxable bonds, and ETFs are selected on the basis of any or all of the following criteria: the fund's performance history; the industry sector in which the fund invests; the track record of the fund's manager; the fund's investment objectives; the fund's management style and philosophy; and/or the fund's management fee structure. Portfolio weighting between funds and market sectors will be determined by each client's individual needs and circumstances.

Financial Insights, Inc. may also provide advice with regard to certain investment products not maintained at their primary custodian, such as assets held in employer sponsored retirement plans and qualified tuition plans (529's). In these situations, Financial Insights, Inc. directs or recommends the allocation of client assets within the various options available.

Financial Insights, Inc. caters its advisory services in a manner consistent with the clients' risk tolerance, timeline, and liquidity needs. Financial Insights, Inc. consults with clients on an ongoing basis and requests that clients notify the firm if there are changes in their financial situation.

Account Review and Monitoring:

A service that we provide our clients to review the quality and appropriateness of the investments and monitor the asset allocation of retirement accounts, including 401(k), 401(a), 403(b), 457, investment, and 529 College Savings Accounts. This service is important to ensure that Financial Insights, Inc. is able to perform a holistic analysis of our client's circumstances.

Tailoring of Advisory Services

We offer individualized investment advice to clients utilizing our Investment Advisory Services. Additionally, we offer general investment advice to clients utilizing our Financial Planning Services.

Our firm does not usually allow clients to impose restrictions on investing in certain securities or types of securities due to the level of difficulty this would entail in managing their account. Exceptions will be made on a case-by-case basis.

Participation in Wrap Fee Programs

We do not sponsor a Wrap Fee Program.

Regulatory Assets Under Management

As of December 31, 2016, we actively manage \$267,076,713 clients' assets on a discretionary basis and \$1,870,905 of client assets on a non-discretionary basis for a total of \$268,947,618.

Item 5: Fees and Compensation

How We Are Compensated for Our Advisory Services

Financial Planning:

We charge on an hourly or flat fee basis for financial planning and consulting services. Our hourly fee is \$200 for specific consultations. Flat fees for a formal plan generally range from \$1,500 to \$5,000, depending on the nature and complexity of each client's circumstances and the nature and duration of the work requested. This hourly rate may be negotiable depending on the nature and complexity of each client's circumstances and financial planning projects. If appropriate, an estimate for total hours may be determined at the start of the advisory relationship. Financial Insights, Inc. requires one half of the financial planning fee payable upon execution of the agreement and balance due upon completion.

Research Analysis (such as Living Trust, Estate, Divorce, amongst other topics) and Estate Management Services are billed at \$125 per hour with a minimum charge of \$500. General Administrative Services, tax cost basis and gain/loss calculation are billed at \$50 per hour, with a one-hour minimum charge.

Investment Advisory Services:

An annual investment advisory fee for portfolios consisting of mutual funds, individual equities, ETF's, closed-end funds, REITs, and certificates of deposits are charged on accounts as set forth in Financial Insight's Investment Advisory Agreement. The fee schedule is as follows:

Assets Under Management	Annual Percentage of Assets Charge
First \$1,000,000	1.00%
Next \$4,000,000	0.75%
Over \$5,000,000	0.50%

Our firm's annualized fees are billed in advance based on the value of your account on the last day of the previous quarter. Fees may vary based upon the complexity of a client's situation and the level of service given to each client. In certain circumstances, all fees may be negotiable. Some accounts may be charged

administrative fees only. A lower fee may be charged for a fixed income portfolio. Clients should note that similar advisory services may or may not be available from other registered investment advisors for similar or lower fees.

As part of this billing process, the client's custodian is advised of the amount of the fee to be deducted from that client's account. On at least a quarterly basis, the custodian is required to send to the client a statement showing all transactions within the account during the reporting period.

Investment advisory fees are calculated based on an annual rate and paid in quarterly increments in advance. The initial quarterly fee is prorated based on the number of days in the calendar quarter after inception of the account, as specified in the terms of the Investment Advisory Agreement. Subsequent quarterly fees are also prorated based on the actual number of days in the calendar quarter versus the number of days in a full year. To calculate the quarterly fee, the aggregate dollar amount of the client's account(s) based on the quarter ending values on the last business day of the months of March, June, September and December is multiplied by the Annual Advisory Fee (listed above) then by the number of days in the quarter and the result is divided by 365 (the number of days in a year).

For purposes of determining fees, accounts that meet the criteria for related accounts will be aggregated to determine if a lower fee will apply. Related accounts will be combined for fee purposes so that each account will pay a fee, which is calculated on the basis of the total of all aggregated accounts. Related accounts are accounts of an individual, his/her spouse and their children, and includes individually owned accounts, IRAs, self-directed accounts (i.e. directed by individual participants) under an employee benefit pension plan ("ERISA plan"), and ERISA plans in which an individual is the sole participant. Furthermore, accounts of the same corporation or business entity are normally deemed as related and will therefore typically be aggregated. For example, if ABC Manufacturing has both a profit sharing plan and a pension plan, these two accounts will be considered related accounts and will be aggregated for purposes of determining the Annual Advisory Fee.

No fee will be credited to the client for the current calendar quarter should any withdrawals from the Investment Account occur in the same calendar quarter. Client may terminate the services of Financial Insights, Inc. upon written notification, and will be entitled to a prorated credit against the previously paid Advisory Fee, based on the number of calendar days remaining after the service was no longer in effect in the final quarter. Fees will be debited from the account in accordance with the client authorization in the Investment Advisory Agreement by the custodian(s).

Financial Insights, Inc. will not be compensated on the basis of a share of capital gains or capital appreciation of any account's investments other than as such capital gains and appreciation increase the value of the account on which Financial Insights, Inc.' fee is calculated each quarter.

Because mutual funds pay advisory fees to their managers and such fees are therefore indirectly charged to all holders of mutual fund shares, client's with mutual funds in their portfolios are effectively paying both the applicant and their mutual fund manager for the management of their assets. Certain mutual funds, in which clients may invest, distribute payments to broker-dealers or custodians. Such payments may be distributed pursuant to a 12b-1 distribution plan or other such plan as compensation for administrative services and are distributed from the fund's total assets. Neither Financial Insights, Inc. nor any of its officers and employees will receive, nor may they legally receive, any such payments.

Custodians of client's assets may receive expense reimbursements from some mutual fund companies in an amount equal to the 12b-1 fees. Receipt of this revenue may directly offset some of the custodial and transaction costs that otherwise could have been charged to Financial Insights, Inc. or the client's. Any such relief from the payment of custodial and transaction charges by Financial Insights, Inc. will not result in a credit to client.

Raymond James Financial Services, Inc. Independent Clearing Account (ICA)

Financial Insights, Inc., through its participation in a program with the Investment Advisor Division (IAD) of Raymond James Financial Services, Inc. (RJFS) provides an account called the Independent Clearing Account. The Independent Clearing Account allows Financial Insights, Inc. to monitor and manage client assets through a myriad of investment vehicles including, but not limited to, stocks, bonds, mutual funds (no-load, institutional and funds at Net Asset Value (NAV)), closed end funds, ETF's, UIT's, and REIT's. Financial Insights, Inc. does not participate in option trading. Financial Insights, Inc. will manage the account on a discretionary or non-discretionary basis, according to the client's objectives and will deduct any Investment Advisory Service fees directly from the client's account or other account previously designated by the client.

There are nominal transaction charges for the execution of trades in the Independent Clearing Account, listed below, which are paid to RJFS and are in addition to Financial Insights, Inc.' Investment Advisory Service fee.

Equity & ETF's Transaction Fees	Bonds	M/F's, UIT's & Closed End Funds*
\$9.95 + \$.01 per share over 1,000 shares	\$14.95/Buy & \$5.95/Sell	\$19.95

*Select no-load funds are offered at no-transaction fee. These fees are subject to change by RJFS at any time.

*Select no-load funds & **ETFS**

Fixed Income:

Fixed Income trades will include a markup based on the length-to-maturity on the bond and will be capped at \$200 per trade. The markup schedule for Fixed Income trades:

- < 6 months - \$0 per bond
- > 6 months to < 1 year - \$0.50 per bond
- > 1 year to < 2 years - \$1.00 per bond
- > 2 years - \$2.00 per bond

These fees are subject to change by RJFS at any time.

In choosing the Independent Clearing Account, clients authorize the following per the Raymond James Financial Services' Independent Clearing Account Client Agreement:

- Trading Authorization – client authorizes RJFS to execute trades and engage other investment advisors at the direction of Financial Insights, Inc. as provided under the terms of the Client Agreement.
- Disbursement Authorization – client authorizes RJFS to disburse funds for investment purposes, or to the client, as instructed by Financial Insights, Inc. Client authorizes RJFS to make disbursements of funds held in the account (1) to banks, broker-dealers, investment companies or other financial institutions, or for credit, to an account of identical registration, or (2) to client at address of record.
- Fee Payment Authorization – client authorizes RJFS to pay management fees to Financial Insights from the client's account.

- Release of Information Authorization - client authorizes RJFS to duplicate copies of trade confirmations, account statements and other information to Financial Insights and other parties as directed by Financial Insights.

Third Party Wrap Fee Program Services

In addition to our own Investment Advisory Services, Financial Insights, Inc. provides access to wrap fee programs sponsored by Raymond James Financial Services ("Raymond James"), a FINRA-member broker-dealer unaffiliated with Financial Insights, Inc. Through these programs, client accounts are managed by independent third party investment advisors. These programs provide additional investment opportunities among mutual funds, stocks, bonds, and additional securities.

Financial Insights, Inc., Inc. may refer clients to Asset Management Services (AMS), which are wrap fee programs offered through Raymond James Financial Services (RJFS). These wrap fee programs are professionally managed stock and bond portfolios. AMS utilizes independent money managers who specialize in various investment options. Minimum account size for these managed stock and bond portfolios is normally \$50,000 and in some cases \$250,000.

If the investment program recommended to a client is a wrap fee program, the client will also receive the wrap fee brochure and fee schedule provided by RJFS.

Financial Insights, Inc. will gather information regarding the client's financial circumstances, and based on this information, we may conclude that a third party program is better suited to the client and recommend a program in accordance with the client's best interests. Factors considered in making this recommendation include account size, risk tolerance, the opinion of each client and the investment philosophy of third party independent advisors available through the various programs we have access to. We will assist the client in reviewing his/her income and expenditures, investment objectives, risk tolerance, liquidity requirements, investment restrictions and other relevant factors. Financial Insights, Inc. will then provide this information to program sponsors selected by the client and, on an on-going basis, will serve as the client's liaison to the program sponsor.

We will meet with the client on a regular basis, or as determined by the client, to review the account(s). Financial Insights, Inc. will contact the client on at least an annual basis to review the client's program account and investments. As appropriate, we will provide updated information about the client's financial circumstances to program sponsors in an effort to make necessary adjustments to the client's portfolio in a timely fashion. As such, clients should notify Financial Insights, Inc. immediately of any material changes in the client's financial situation or investment objectives and/or the client wishes to impose or modify existing investment restrictions.

During regular account reviews, if we believe that a different program becomes better suited to a client's particular needs, based on changes in the client's financial circumstances, market conditions or available programs or program options, we may suggest that the client contract with a different program sponsor. Under this scenario, Financial Insights, Inc. will assist the client in selecting a new program. However, any move to a new program is solely at the discretion of the client.

Third party investment programs generally include services by independent investment advisors consisting of proprietary model portfolios. The independent investment advisors manage model portfolios based on the goals of the portfolio rather than the individual circumstances of any client account. Model portfolios may include only mutual funds or individual stocks and bonds. We may assist the client in order to determine the appropriate asset allocation among available portfolios.

In evaluating wrap fee arrangements, the client should recognize that neither Financial Insights, Inc. nor any third party advisor managing client assets through the program might negotiate brokerage commissions for the execution of transactions in the client's account. Transactions are effected 'net,' i.e., without commission, and a portion of the wrap fee is generally considered to be in lieu of commissions. Trades are generally expected to be executed only with the broker-dealer with which the client has entered into the wrap fee arrangement, in this case Raymond James, so that the investment advisor(s) managing the client's assets through the program will not be free to seek best price and execution by placing transactions with other broker-dealers. Our experience indicates that certain broker-dealers under clients' wrap fee agreements generally can offer best price for transactions in listed equity securities, but, no assurance can be given that such will continue to be the case with those or other broker-dealers which may offer wrap fee arrangements, nor with respect to transactions in other types of securities. Accordingly, the client may wish to satisfy himself/herself that the broker-dealer offering the 'wrap fee' arrangement can provide adequate price and execution of most or all transactions. The client should also consider that, depending upon the level of the wrap fee charged by the broker-dealer, the amount of portfolio activity in the client's account, the value of custodial and other services which are provided under the arrangement, and other factors, the wrap fee may or may not exceed the aggregate cost of such services if they were to be provided separately and if the investment advisors managing the client's assets through the program were free to negotiate commissions and seek best price and execution of transactions for the client's account.

Clients will receive separate disclosure documents for any particular program recommended. Clients are encouraged to review each disclosure document regarding the particular characteristics of any program and managers recommended.

Account Review and Monitoring:

Account review and monitoring services are generally billed based on the assets under consultation at the rate listed in the Investment Advisory Agreement, which is currently 0.50% annually, with a minimum annual fee of \$75. This fee is charged quarterly in advance or annually.

All fees and fee billing arrangements will be agreed upon by the client at the start of the advisory relationship. Previously established accounts may be grandfathered at a lesser rate.

Financial Insights, Inc., Inc. will never hold advanced paid fees greater than \$1,200 for more than six months before such advanced payment has been earned.

Other Types of Fees and Expenses:

All fees paid to Financial Insights, Inc. for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and ETFs to their shareholders. In the case of mutual funds, these fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. A client could invest in a mutual fund directly, without the services of Financial Insights, Inc. In that case, the client would not receive the services provided by Financial Insights, Inc. which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and the fees charged by Financial Insights, Inc. to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

Clients are advised that certain mutual funds, in which the client may invest, distribute payments to broker-dealers or custodians. Such payments may be distributed pursuant to a 12b-1 distribution plan or other such plan as compensation for administrative services and are distributed from the fund's total assets. Neither Financial Insights, Inc. nor any of its officers and employees will receive, nor may they legally receive, any such payments.

Custodians of client assets may receive expense reimbursements from some mutual fund companies in an amount equal to the 12b-1 fees. Receipt of this revenue may directly offset some of the custodial and transaction costs that otherwise could have been charged to Financial Insights, Inc. or the client. Financial Insights, Inc., in determining the amount of the fee it would charge the client, will factor in the indirect benefit of the custodian's receipt of this revenue. Any such relief from the payment of custodial and transaction charges by Financial Insights, Inc. will not result in a credit to client. Such payments are made from the assets of the mutual funds and, therefore, reduce overall fund performance. Financial Insights, Inc. uses such investments in client's portfolios where it reasonably believes the overall performance of the fund, after accounting for such charges, merits inclusion. In addition to Financial Insights, Inc.'s advisory fees for Investment Advisory Services, clients are responsible for the fees and expenses charged or imposed by custodians or imposed by third party service providers, broker-dealers, including, but not limited to, any spreads, transaction charges, commissions, transfer or processing fees and revenue sharing fees regardless of whether Financial Insights, Inc. or an independent investment manager effects transactions for the client's account(s). As disclosed above, clients enrolled in Third Party Wrap Fee Program Services will not incur separate brokerage charges for transactions executed in their account. Please refer to the "Brokerage Practices" section (Item 12) of this Form ADV for additional information.

Termination and Refunds

We charge our advisory fees quarterly in advance. Either party, for any reason upon 30 days written notice, may cancel a client agreement at any time. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable. The client has the right to terminate an agreement without penalty within five business days after entering into the agreement.

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

Financial Insights, Inc. does not charge performance-based fees to any client.

Item 7: Types of Clients & Account Requirements

Financial Insights, Inc. provides advisory services to the following types of clients: individuals, including high net worth individuals, employee benefit plans, trusts, estates, charitable organizations, corporations and other businesses.

Our requirements for opening and maintaining accounts or otherwise engaging us:

- We require a minimum account balance of \$500,000 for our Investment Advisory Services. Generally, this minimum account balance requirement is negotiable.
- We generally charge a minimum fee of \$1,500 for written financial plans.

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

Methods of Analysis

We use the following methods of analysis in formulating our investment advice and/or managing client assets:

Fundamental Analysis. We attempt to measure the intrinsic value of a security by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management of the company itself) to determine if the company is underpriced (indicating it may be a good time to buy) or overpriced (indicating it may be time to sell).

Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.

Mutual Fund and/or ETF Analysis. We look at the experience and track record of the manager of the mutual fund or ETF in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We also look at the underlying assets in a mutual fund or ETF in an attempt to determine if there is significant overlap in the underlying investments held in other funds in the client's portfolio. In addition, we monitor the funds or ETFs in an attempt to determine if they are continuing to follow their stated investment strategy.

A risk of mutual fund and/or ETF analysis is that, as in all securities investments, past performance does not guarantee future results. A manager who has been successful may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a fund or ETF, managers of different funds held by the client may purchase the same security, increasing the risk to the client if that security were to fall in value. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the fund or ETF, which could make the fund or ETF less suitable for the client's portfolio.

Legacy Holdings. Investment advice may be offered on any investments held by a client at the start of the advisory relationship. In general, depending on tax considerations and client sentiment, these investments may be sold over time and the assets invested in the appropriate Financial Insights, Inc. investment strategy. As with any investment decision, there is the risk that Financial Insights, Inc.' timing with respect to the sale and reinvestment of these assets will be less than ideal or even result in a short term or long term loss to the client.

Risks for all forms of analysis. Our securities analysis methods rely on the assumption that the funds or companies whose securities we purchase and sell, the rating agencies that review these securities, and other publicly available sources of information about these securities, are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

Investment Strategies

We use the following strategies in managing client accounts, provided that such strategies are appropriate to the needs of the client and consistent with the client's investment objectives, risk tolerance, and time horizons, among other considerations:

Long-term/Short-term purchases. We purchase securities and generally hold them in the client's account for a year or longer. Short-term purchases may be employed as appropriate when:

- We believe the securities to be currently undervalued, and/or
- We want exposure to a particular asset class over time, regardless of the current projection for this class.

A risk in a long-term purchase strategy is that by holding the security for this length of time, we may not take advantages of short-term gains that could be profitable to a client. Moreover, if our predictions are incorrect, a security may decline sharply in value before we make the decision to sell.

Third Party Program Services. We examine the experience, expertise, investment philosophies, and past performance of independent third-party investment managers in an attempt to determine if that manager or investment program sponsor has demonstrated an ability to invest over a period of time and in different economic conditions. In some cases, we examine a program sponsor's due diligence efforts and rely on such efforts rather than conducting independent due diligence of each third party manager available through the applicable program with which client assets may be invested. We also monitor the underlying holdings, strategies, concentrations and leverages used by any manager in which our clients' assets are invested as part of our overall periodic risk assessment.

With respect to Wrap Fee Managed Program Services, clients should refer to the Program Sponsors disclosure document and the disclosure documents of any third party strategist or manager selected to directly manage any portion of the client's account, as appropriate, for more information regarding the methods of analysis, sources of information and investment strategies used in servicing client accounts.

A risk of investing with a third-party manager who has been successful in the past is that he/she may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a third-party manager's portfolio, there is also a risk that a manager may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for our clients. Moreover, as we do not control the manager's daily business and compliance operations, it is possible for us to miss the absence of internal controls necessary to prevent business, regulatory or reputational deficiencies.

Risks applicable to all strategies. Securities investments are not guaranteed and you may lose money on your investments. We ask that you work with us to help us understand your tolerance for risk.

Risk of Loss

Investing in securities involves risk of loss that clients should be prepared to bear. While the stock market may increase and your account(s) could enjoy a gain, it is also possible that the stock market may decrease and your account(s) could suffer a loss. It is important that you understand the risks associated with investing in the stock market, are appropriately diversified in your investments, and ask us any questions you may have.

Item 9: Disciplinary Information

We are required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management.

Neither our firm nor our management personnel have any reportable disciplinary events to disclose.

Item 10: Other Financial Industry Activities and Affiliations

Financial Insights is not affiliated, through common control, ownership or otherwise, with any other financial industry entity.

As previously disclosed, Financial Insights, Inc. may recommend the services of various registered investment advisors to its clients through a wrap fee program sponsored by Raymond James Financial Services. In exchange for this recommendation, Financial Insights, Inc. receives a portion of the investment advisory fee from Raymond James. The fee received by Financial Insights, Inc. is a percentage of the overall wrap program fee charged by Raymond James. The portion of the advisory fee paid to Financial Insights, Inc. does not increase the total advisory fee paid to the selected investment advisor by the client.

As appropriate for each client's financial situation, insurance, and/or fixed income annuities may be presented or included to create a retirement pension as part of the financial plan.

Representatives of our firm are registered representatives of Purshe Kaplan Sterling Investments, Inc., member FINRA/SIPC. As a result of these transactions, they receive normal and customary commissions. A conflict of interest exists as these commissionable securities sales create an incentive to recommend products based on the compensation earned.

Financial Insights, Inc. endeavors at all times to put the interest of its clients first as part of our fiduciary duty as a registered investment advisor; we take the following steps to address this conflict:

- We disclose to clients the existence of any material conflicts of interest;
- We disclose to clients that they are not obligated to purchase recommended investment products by our employees or affiliated companies;
- We collect, maintain and document accurate, complete and relevant client background information, including the client's financial goals, objectives and risk tolerance;
- Our firm's management conducts regular reviews of each client's account (s) to verify that all recommendations made to a client are suitable to the client's needs and circumstances;
- We require that our employees seek prior approval of any outside employment activity so that we may ensure that any conflicts of interests in such activities are properly addressed;
- We periodically monitor any outside employment activities to verify that any conflicts of interest continue to be properly addressed by our firm; and
- We educate our employees regarding the responsibilities of a fiduciary, including the need for having a reasonable and independent basis for the investment advice provided to clients.

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

Our firm has adopted a Code of Ethics, which sets forth high ethical standards of business conduct that we require of our employees, including compliance with applicable federal securities laws.

Financial Insights, Inc. and our personnel owe a duty of loyalty, fairness and good faith towards our clients, and have an obligation to adhere not only to the specific provisions of the Code of Ethics but to the general principles that guide the Code.

Our Code of Ethics includes policies and procedures for the review of quarterly securities transactions reports as well as initial and an annual securities holding reports that must be submitted by the firm's access persons. Among other things, our Code of Ethics also requires the prior approval of any acquisition of

securities in a limited offering (e.g., private placement) or an initial public offering. Our code also provides for oversight, enforcement and recordkeeping provisions.

Financial Insights, Inc.'s Code of Ethics further includes the firm's policy prohibiting the use of material non-public information. While we do not believe that we have any particular access to non-public information, all employees are reminded that such information may not be used in a personal or professional capacity.

A copy of our Code of Ethics is available to our advisory clients and prospective clients. You may request a copy by email sent to ali@financialinsights.net, or by calling us at 253-627-6010.

Financial Insights, Inc. and individuals associated with our firm are prohibited from engaging in principal or agency cross transactions.

Our Code of Ethics is designed to assure that the personal securities transactions, activities and interests of our employees 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.

Our firm and/or individuals associated with our firm may buy or sell for their personal accounts securities identical to or different from those recommended to our clients. In addition, any related person(s) may have an interest or position in a certain security (ies) which may also be recommended to a client.

It is the expressed policy of our firm that no person employed by us may purchase or sell any security prior to a transaction(s) being implemented for an advisory account, thereby preventing such employee(s) from benefiting from transactions placed on behalf of advisory accounts.

As these situations present potential conflicts of interest, we have established the following restrictions in order to ensure its fiduciary responsibilities:

- No principal or employee of Financial Insights, Inc. may put his or her own interest above the interest of an advisory client.
- No director, officer or employee of Financial Insights, Inc. shall buy or sell securities for their personal portfolio(s) when their decision is substantially derived, in whole or in part, by reason of his or her employment unless the information is also available to the investing public on reasonable inquiry. No person of Financial Insights, Inc. shall prefer his or her own interest to that of the advisory client.
- Financial Insights, Inc. does not allow any IPO or private placement investments by related persons of the firm.
- Financial Insights, Inc. has established procedures for the maintenance of all required books and records.
- Clients can decline to implement any advice rendered, except in situations where Financial Insights, Inc. is granted discretionary authority and has not received prior written instructions from the client.
- Financial Insights, Inc. maintains a list of all securities holdings for itself, and anyone associated with this advisory practice with access to advisory recommendations. These holdings are reviewed on a regular basis by the investment team.
- Financial Insights, Inc. requires delivery and acknowledgement of the Code of Ethics by each supervised person of our firm.
- Financial Insights, Inc. has established policies requiring the reporting of Code of Ethics violations to our senior management.
- Financial Insights, Inc. emphasizes the unrestricted right of the client to decline to implement any advice rendered.

- Financial Insights, Inc. requires that all individuals must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices.
- Any individual not in observance of the above may be subject to disciplinary action up to and including termination.

Item 12: Brokerage Practices

Financial Planning Services

Due to the nature of our financial planning services, we do not negotiate commissions with broker-dealers, place block client trades, obtain volume discounts or obtain the best price. Clients will be required to select their own broker-dealers for the implementation of financial planning services recommendations. As appropriate, we may recommend any one of several brokers. Clients must independently evaluate these brokers before opening an account. The factors considered by Financial Insights, Inc. when making this recommendation are the broker's ability to provide professional services, Financial Insights, Inc.'s experience with the broker, the broker's reputation, and the broker's financial strength, among other factors. Financial Insights, Inc.'s financial planning services clients may use any broker or dealer of their choice.

Best Execution

While the term Best Execution typically defines the investment advisor as having a fiduciary duty to execute "securities transactions for clients in such a manner that the clients' total cost or proceeds in each transaction is the most favorable under the circumstances," Financial Insights, Inc. has disclosed to its clients that we will not research all other custodians and may not always have the best execution for individual securities. Best execution does not always mean the best price. Although this is considered, Financial Insights, Inc. has reviewed and considered the full range and quality of the services of the custodian of its client accounts. For clients seeking a recommendation for brokerage or custodial services, Financial Insights, Inc. may suggest the use of one or more custodians/broker-dealers, which have been evaluated by the firm. Due to its ability to meet the criteria established by Financial Insights, Inc., as set forth below, and depending on client circumstances and needs, we most typically recommend the use of Raymond James Financial Services, a FINRA member broker-dealer unaffiliated with Financial Insights, Inc. (hereinafter "Raymond James"). Clients should evaluate any custodians/brokers recommended by Financial Insights, Inc. before opening an account. Financial Insights, Inc. may blanket recommend any stock for purchase or sale to any of our clients at the same time. We use financial planning principles based on our clients' individual risk tolerance and objectives before making an investment recommendation.

Raymond James Financial Services checks to ensure that the customer receives at least the national best bid or offer (NBB) at the time of execution on all transactions on a daily basis. Raymond James & Associates currently uses third party vendors to provide most of the prices for all securities excluding Negotiable Certificates of Deposit. The prices provided in the Back Office system are from the prior night's close. Since Raymond James Financial Services is not pricing securities on a real-time basis, Back Office prices are not to be relied on for trading purposes. Before buying or selling securities Financial Insights, Inc. will verify prices on a real-time quote system or contact the appropriate trading area for a current quote. 20 minute delayed quotes are available via Advisor's Resource and Investor's Access.

The criteria considered by Financial Insights, Inc. when making custodian/broker recommendations are the broker's ability to provide professional services, Financial Insights, Inc.'s experience with the broker, the broker's reputation, the broker's quality of execution services and costs of such services, among other factors. Clients should note that Financial Insights, Inc. might receive certain benefits or conveniences from Raymond James that it would not receive if it did not offer investment advice to clients. Clients are not under any obligation to direct the use of any recommended broker. Clients are free to select the custodian/broker-

dealer of his or her choice, however, Financial Insights, Inc. reserves the right to decline acceptance of any client account if Financial Insights, Inc. believes that the directed custodian/broker would hinder Financial Insights, Inc.'s fiduciary duty to the client and/or its ability to service the account. Not all advisors require clients to direct the use of a particular broker.

When block trading, we trade an aggregate block of securities composed of assets from multiple client accounts. Depending on the security traded, failure to aggregate a trade may result in clients paying a different price for the same security on the same or a different trading day.

Financial Insights, Inc. will only be able to block trade for client accounts who direct the use of the same broker.

Financial Insights, Inc.'s block trading policy and procedures are as follows:

- Financial Insights, Inc.'s policies for the aggregation of transactions shall be fully disclosed in this Form ADV;
- Financial Insights, Inc. will not aggregate transactions unless it believes that aggregation is consistent with our fiduciary duty to our clients and is consistent with the terms of Financial Insights, Inc.'s investment advisory agreement with each client for which trades are being aggregated;
- No advisory client will be favored over any other client; each client that participates in an aggregated order will participate at the average share price for all Financial Insights, Inc.'s transactions in a given security on a given business day. Depending on the client's agreement with the custodian/broker, transaction costs will be based on the number of shares traded for each client;
- Transactions for each client generally will be effected independently, unless Financial Insights, Inc. decides to purchase or sell the same securities for several clients at approximately the same time. Financial Insights, Inc. may (but is not obligated to) combine or "batch" such orders to obtain best execution, or to allocate equitably among Financial Insights, Inc.'s client differences in prices and commissions or other transaction costs that might have been obtained had such orders have been placed independently. In this situation, transactions will generally be averaged as to price and allocated among Financial Insights, Inc. clients *pro rata* to the purchase and sale orders placed for each client on any given day.
- To the extent that Financial Insights, Inc. determines to aggregate client orders for the purchase or sale of securities, Financial Insights, Inc. generally does so in accordance with applicable rules and regulations. Financial Insights, Inc. does not receive any additional compensation or remuneration as a result of the aggregation. In the event that Financial Insights, Inc. determines that a prorated allocation is not appropriate under the particular circumstances, the allocation will be made upon other relevant factors.
- Before entering an aggregated order, Financial Insights, Inc. will prepare a written allocation statement specifying the participating client accounts and how it intends to allocate the order among those clients;
- If the aggregated order is filled in its entirety, it will be allocated among clients in accordance with the allocation statement; if the order is partially filled, orders for each account will be filled based upon random number generation.
- Notwithstanding the foregoing, the order may be allocated on a basis different from that specified in the Allocation Statement if all client accounts receive fair and equitable treatment and the reason for different allocation is explained in writing and is approved by Financial Insights, Inc.'s

compliance officer no later than one hour after the opening of the markets on the trading day following the day the order was executed;

- Financial Insights, Inc.'s books and records will separately reflect, for each client account, the orders of which are aggregated, the securities held by, and bought and sold for that account;
- Funds and securities of clients whose orders are aggregated will be deposited with one or more banks or broker-dealers, and neither the clients' cash nor their securities will be held collectively any longer than is necessary to settle the purchase or sale in question on a delivery versus payment basis; cash or securities held collectively for clients will be delivered out to the custodian bank or broker-dealer as soon as practicable following the settlement;
- Financial Insights, Inc. will receive no additional compensation or remuneration of any kind as a result of the proposed aggregation; and
- Individual advice and treatment will be accorded to each advisory client and no client or account will be favored over another.

Clients electing not to grant us discretionary authority over their account may not be aggregated with other clients' trades due to the time involved in obtaining the client's approval for each trade.

As applicable, clients should refer to the disclosure documents of any sub advisor selected to manage all or a portion of the client's portfolio for information regarding the sub advisors' brokerage practices.

Pursuant to advice provided by Financial Insights, Inc., we may receive research services from brokers paid for by 12b-1 fees received by the brokers from funds in which client accounts have been invested. This arrangement creates a conflict of interest, which has the potential to influence recommendations made to clients regarding which mutual funds would be most appropriate for the client's portfolio.

Item 13: Review of Accounts

Financial Planning Services

REVIEWS: These client accounts will be reviewed as contracted for at the inception of the advisory relationship.

REPORTS: Financial Planning clients will receive a complete, written financial plan. Additional reports will be determined by the client and Financial Insights, Inc.

Investment Advisory Services

REVIEWS: The underlying securities within these accounts are continuously monitored; accounts are reviewed regularly, based on client needs. Accounts are reviewed in the context of each client's stated investment objectives and guidelines. More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances, or the market, political or economic environment.

As applicable, clients should refer to the disclosure document (Form ADV, Part 2, or other disclosure document in lieu of Part 2) of sub advisors for information regarding the frequency of reviews conducted by the sub advisor(s).

REPORTS: In addition to at least monthly custodial statements, Financial Insights, Inc. will provide clients with Performance Reporting and Asset Management Reports upon request and during annual reviews.

Third Party Wrap Fee Program Services:

REVIEWS: For clients enrolled in Third Party Wrap Fee Programs, Financial Insights, Inc. will contact clients at least annually to determine whether there have been any changes in the client's financial situation or investment objectives. In addition, Financial Insights, Inc. will monitor the performance of the selected third party investment managers at least quarterly. If Financial Insights, Inc. determines that a particular investment manager is not performing adequately, Financial Insights, Inc. will contact the client to discuss moving the client's assets from that selected investment advisor(s) and to another investment advisor(s) through the Program.

REPORTS: Clients should refer to the Program Sponsor's disclosure document and the disclosure documents of any third party strategist or manager selected to directly manage any portion of the client's account, as appropriate, for more information regarding the nature and frequency of reports provided by the corresponding investment officers.

Financial Insights, Inc. will not generally provide additional reports to clients participating in the Programs unless separately negotiated and contracted for.

Item 14: Client Referrals and Other Compensation

We do not compensate any third party for client referrals.

As disclosed at Item 12 of this brochure, pursuant to advice provided by Financial Insights, Inc., we may receive research services from brokers paid for by 12b-1 fees received by the brokers from funds in which client accounts have been invested.

This arrangement may create a conflict of interest, which has the potential to influence recommendations made to clients regarding which mutual funds would be most appropriate for the client's portfolio. As such, we have established the following restrictions in order to ensure our fiduciary responsibilities:

- The receipt of research paid for by 12b-1 fees is disclosed in this Brochure and provided to all clients;
- Financial Insights, Inc. will ensure that it has an independent basis for any investment recommendation made to a client.

Item 15: Custody

Financial Insights, Inc. previously disclosed in the "Fees and Compensation" section (Item 5) of this Brochure that it does not directly debit advisory fees from client accounts.

Because the custodian does not calculate the amount of the fee to be deducted, it is important for clients to carefully review their custodial statements to verify the accuracy of the calculation, among other things. Clients should contact us directly if they believe that there may be an error in their statement.

Item 16: Investment Discretion

We provide our Investment Advisory Services on a discretionary and non-discretionary basis, which means

that we will place trades in a client's account, as we deem appropriate based on the information previously gathered with or without contacting the client prior to each trade to obtain the client's permission.

Under these circumstances, our discretionary authority includes the ability to do the following without contacting the client:

- Determine the security to buy or sell; and/or
- Determine the amount of the security to buy or sell.

Clients give us discretionary authority when they sign a discretionary investment management agreement with our firm, and may reasonably limit this authority by giving us written instructions. Clients may also change/amend such limitations by once again providing us with written instructions.

For clients that have elected not to grant us investment discretion over their account, we note that trades in their accounts will typically be executed after trades in the same securities are placed in discretionary accounts. This is due to the time involved in obtaining the requisite client approval before placing the trade. Consequently, depending, in part, on the type of security traded there may be a difference in the price paid per share of a given security and, if applicable, the commission rates paid by these clients as compared to other clients.

Item 17: Voting Client Securities

As a matter of firm policy, we do not vote proxies on behalf of clients. Therefore, although our firm may provide investment advisory services relative to client investment assets, clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets. Clients are responsible for instructing each custodian of the assets, to forward to the client, along with copies of all proxies and shareholder communications relating to the client's investment assets.

We may provide clients with consulting assistance regarding proxy issues if they contact us with questions at our principal place of business.

Other Corporate Matters: We will advise and/or act on behalf of the client in legal proceedings involving companies whose securities are held in the clients account(s), including, but not limited to, the filing of Proofs of Claim in class action settlements. If desired, clients may direct us to transmit copies of class action notices to the client or a third party. Upon such direction, we will make commercially reasonable efforts to forward such notices in a timely manner.

Item 18: Financial Information

Financial Insights, Inc. has no adverse financial circumstances to report.

Under no circumstances do we require or solicit payment of fees in excess of \$1,200 per client more than six months in advance of services rendered. Therefore, we are not required to include a financial statement. Financial Insights, Inc. has not been the subject of a bankruptcy petition at any time during the past ten years.