#### Item 1 – Cover Page

Insight Financial Strategists, LLC 1349 Centre Street Newton, MA 02459 (781)489-3014 insightfinancialstrategists.com

Date of Disclosure Brochure: March 30, 2020

This disclosure brochure provides information about the qualifications and business practices of Insight Financial Strategists, LLC (also referred to as we, us and Insight Financial Strategists throughout this disclosure brochure). If you have any questions about the contents of this disclosure brochure, please contact Christoph Chen at (781) 489-3014. The information in this disclosure brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Insight Financial Strategists is also available on the Internet at <u>www.adviserinfo.sec.gov</u>. You can view our firm's information on this website by searching for Insight Financial Strategists, LLC or our firm's CRD number 165125.

\*Registration as an investment adviser does not imply a certain level of skill or training.

Item 2 – Material Changes

The following material changes have been made to this Disclosure Brochure since our last annual filing in March 2019.

• Our address moved to 1349 Centre Street, Waltham, MA 02459

We will ensure that you receive a summary of any material changes to this and subsequent disclosure brochures within 120 days after our firm's fiscal year ends. Our firm's fiscal year ends on December 31, so you will receive the summary of material changes no later than April 30 each year. At that time, we will also offer or provide a copy of the most current disclosure brochure. We may also provide other ongoing disclosure information about material changes as necessary.

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# Item 4 – Advisory Business

Insight Financial Strategists is reapplying to be registered as an investment adviser registered with the State of Massachusetts and is a limited liability company (LLC) formed under the laws of the State of Massachusetts.

- Christoph Chen assumed the role of Chief Compliance Officer (CCO) and Managing Member of Insight Financial Strategists in September 2012. Christoph Chen owns 100% of Insight Financial Strategists. Full details of the education and business background of Christoph Chen is provided at Item 19 of this Disclosure Brochure.
- Insight Financial Strategists filed its initial application to become registered as an investment adviser in August 2012.

# Introduction

The investment advisory services of Insight Financial Strategists are provided to you through an appropriately licensed and qualified individual who is an investment adviser representative of Insight Financial Strategists (referred to as your investment adviser representative throughout this brochure).

#### **Description of Advisory Services**

The following are descriptions of the primary advisory services of Insight Financial Strategists. Please understand that a written agreement, which details the exact terms of the service, must be signed by you and Insight Financial Strategists before we can provide you the services described below.

**Asset Management Services –** Insight Financial Strategists offers asset management services, which involves Insight Financial Strategists providing you with continuous and ongoing supervision over your specified accounts.

You must appoint our firm as your investment adviser of record on specified accounts (collectively, the "Account"). The Account consists only of separate account(s) held by qualified custodian(s) under your name. The qualified custodians will maintain physical custody of all funds and securities of the Account, and you retain all rights of ownership (e.g., right to withdraw securities or cash, exercise or delegate proxy voting and receive transaction confirmations) of the Account.

The Account is managed by us based on your financial situation, investment objectives and risk tolerance. We actively monitor the Account and provide advice regarding buying, selling, reinvesting or holding securities, cash or other investments of the Account.

We will need to obtain certain information from you to determine your financial situation and investment objectives. You will be responsible for notifying us of any updates regarding your financial situation, risk tolerance or investment objectives and whether you wish to impose or modify existing investment restrictions; however we will contact you at least annually to discuss any changes or updates regarding your financial situation, risk tolerance or investment objectives. We are always reasonably available to consult with you relative to the status of your Account. You have the ability to impose reasonable restrictions on the management of your accounts, including the ability to instruct us not to purchase certain securities.

Asset management services may be provided on a "discretionary" basis. If you engage Insight Financial Strategists to provide asset management services on a discretionary basis, we will monitor your accounts to ensure that they are meeting your asset allocation requirements. If any changes are needed to your investments, we will make the changes. These changes may involve selling a security or group of investments and buying others or keeping the proceeds in cash. Clients engaging us on a discretionary basis will be asked to execute a Limited Power of Attorney granting us discretionary authority over the specified accounts.

It is important that you understand that we manage investments for other clients and may give them advice or take actions for them or for our personal accounts that is different from the advice we provide to you or actions taken for you. We are not obligated to buy, sell or recommend to you any security or other investment that we may buy, sell or recommend for any other clients or for our own accounts.

Conflicts may arise in the allocation of investment opportunities among accounts that we manage. We strive to allocate investment opportunities believed to be appropriate for your account(s) and other accounts advised by our firm among such accounts equitably and consistent with the best interests of all accounts involved. However, there can be no assurance that a particular investment opportunity that comes to our attention will be allocated in any particular manner. If we obtain material, non-public information about a security or its issuer that we may not lawfully use or disclose, we have absolutely no obligation to disclose the information to any client or use it for any client's benefit.

**Financial Planning & Consulting Services -** Insight Financial Strategists offers financial planning services, which involve preparing a written financial plan covering specific or multiple topics. We provide full written financial plans, which typically address the following topics: Investment Planning, Retirement Planning, Tax Planning, Education Planning, Portfolios Review, and Asset Allocation. When providing

financial planning and consulting services, the <u>role</u> of your investment adviser representative is to find ways to help you understand your <u>overall</u> financial situation and help you set financial <u>objectives</u>. We also provide modular written financial plans which only cover those specific areas of concern mutually agreed upon by you and us. A modular written financial plan is limited or segmented and does not involve the creation of a full written financial plan. You should be aware that there are important issues that may not be taken into consideration when your investment adviser representative develops his or her analysis and recommendations under a modular written financial plan. Written financial plans prepared by us under this Agreement do not include specific recommendations of individual securities.

We also offer consultations in order to discuss financial planning issues when you do not need a written financial plan. We offer a one-time consultation, which covers mutually agreed upon areas of concern related to investments or financial planning. We also offer "as-needed" consultations, which are limited to consultations in response to a particular investment or financial planning issue raised or request made by you. Under an "as-needed" consultation, it will be incumbent upon you to identify those particular issues for which you are seeking our advice or consultation on.

Our financial planning and consulting services do not involve implementing any transaction on your behalf or the active and ongoing monitoring or management of your investments or accounts. You have the sole responsibility for determining whether to implement our financial planning and consulting recommendations. To the extent that you would like to implement any of our investment recommendations through Insight Financial Strategists or retain Insight Financial Strategists to actively monitor and manage your investments, you must execute a separate written agreement with Insight Financial Strategists for our asset management services.

### Newsletters

Insight Financial Strategists occasionally prepares general, educational and informational newsletters. Newsletters are always offered on an impersonal basis and do not focus on the needs of a specific individual.

### Seminars

Insight Financial Strategists may occasionally provide seminars in areas such as financial planning, retirement planning, estate planning, college planning and divorce planning. Seminars are always offered on an impersonal basis and do not focus on the individual needs of participants.

#### Limits Advice to Certain Types of Investments

Insight Financial Strategists provides investment advice on the following types of investments:

- Mutual Funds
- Exchange Traded Funds (ETFs)
- Exchange-listed Securities
- Foreign Issues
- Corporate Debt Securities
- Certificates of Deposit
- Municipal Securities
- Variable Annuities
- Variable Life Insurance
- US Government Securities

- Interests in Partnerships Investing in Real Estate
- Interests in Partnerships Investing in Oil and Gas Interests

Although we generally provide advice only on the products previously listed, we reserve the right to offer advice on any investment product that may be suitable for each client's specific circumstances, needs, goals and objectives.

It is not our typical investment strategy to attempt to time the market, but we may increase cash holdings modestly as deemed appropriate based on your risk tolerance and our expectations of market behavior. We may modify our investment strategy to accommodate special situations such as low basis stock, stock options, legacy holdings, inheritances, closely held businesses, collectibles, or special tax situations.

(Please refer to Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss for more information.)

## Tailor Advisory Services to Individual Needs of Clients

Insight Financial Strategists' advisory services are always provided based on your individual needs. This means, for example, that when we provide asset management services, you are given the ability to impose restrictions on the accounts we manage for you, including specific investment selections and sectors. We work with you on a one-on-one basis through interviews and questionnaires to determine your investment objectives and suitability information. Our financial planning and consulting services are always provided based on your individual needs. When providing financial planning and consulting services, we work with you on a one-on-one basis through interviews and questionnaires to determine your investment objectives and suitability information.

We will not enter into an investment adviser relationship with a prospective client whose investment objectives may be considered incompatible with our investment philosophy or strategies or where the prospective client seeks to impose unduly restrictive investment guidelines.

### **Client Assets Managed by Insight Financial Strategists**

As of December 31, 2019, Insight Financial Strategists had \$9,411,975 in assets under management. The amount of discretionary assets under management totals \$7,742,301. The amount of non-discretionary assets under management totals \$1,669,674.

### Item 5 – Fees and Compensation

In addition to the information provided in *Item 4 – Advisory Business*, this section provides additional details regarding our firm's services along with descriptions of each service's fees and compensation arrangements. It should be noted that lower fees for comparable service may be available from other sources. A minimum household charge of \$10,000 per year generally applies. This household charge may be waived at the discretion of Insight Financial Strategists. The exact fees and other terms will be outlined in the agreement between you and Insight Financial Strategists.

### Asset Management Services

Fees charged for our asset management services are charged based on a percentage of assets under management, billed in arrears (at the end of the billing period) on a quarterly calendar basis and calculated based on the fair market value of your account as of the last business day of the previous billing period. Fees are prorated (based on the number of days service is provided during the initial billing

period) for your account opened at any time other than the beginning of the billing period. If asset management services are commenced in the middle of the billing period, then the prorated fee for that billing period will be billed in arrears at the end of that billing period.

The asset management services continue in effect until terminated by either party (i.e., Insight Financial Strategists or you) by providing written notice of termination to the other party. When fees are billed in arrears, Insight Financial Strategists will prorate the final fee payment based on the number of days services are provided during the final period. The amount of client assets on the termination date will be used to determine the final fee payment.

The fees for managing assets are as follows:

Assets Under Management	Annual Management Fee
0 - \$1,000,000	1.00%
\$1,000,000 - \$4,000,000	.80%
\$4,000,000 - \$7,000,000	.65%
>\$7,000,000	.55%

In some circumstances the fee charged may be less than above. The fee schedule is specified in the Client's Limited Power of Attorney Addendum. Insight Financial Strategists believes that its annual fee is reasonable in relation to: (1) services provided and (2) the fees charged by other investment advisers offering similar services/programs. However, our annual investment advisory fee may be higher than that charged by other investment advisers offering similar services/programs. In addition to our compensation, you may also incur charges imposed at the mutual fund level (e.g., advisory fees and other fund expenses).

The investment advisory fees will be deducted from your account and paid directly to our firm by the qualified custodian(s) of your account. You will authorize the qualified custodian(s) of your account to deduct fees from your account and pay such fees directly to our firm. Our firm will send you an Advisory Fee statement disclosing the fee to you at the time it is assessed. See *Item 15 – Custody* for more details.

You should review your account statements received from the qualified custodian(s) and verify that appropriate investment advisory fees are being deducted. The qualified custodian(s) will not verify the accuracy of the investment advisory fees deducted. In addition, you may incur certain charges imposed by third parties other than Insight Financial Strategists in connection with investments made through your account including, but not limited to, mutual fund sales loads, 12(b)-1 fees and surrender charges, variable annuity fees and surrender charges, IRA and qualified retirement plan fees, and charges imposed by the qualified custodian(s) of your account. Management fees charged by Insight Financial Strategists are separate and distinct from the fees and expenses charged by investment company securities that may be recommended to you. A description of these fees and expenses are available in each investment company security's prospectus.

# Financial Planning & Consulting Services

Fees charged for our financial planning and consulting services are negotiable based upon the type of client, the services requested, the complexity of the client's situation, the composition of the client's account, other advisory services provided and the relationship of the client and the investment adviser representative. The following are the fee arrangements available for financial planning and consulting services offered by Insight Financial Strategists.

# Fees for Financial Planning Services

Insight Financial Strategists provides financial planning services under an hourly fee arrangement. An

hourly fee is charged by Insight Financial Strategists for financial planning services under this arrangement. The hourly fee generally ranges from \$175 to \$450 depending on the services and the complexity of the task. The fee is specified in the Client's Financial Services Contract. Before commencing financial planning services, Insight Financial Strategists provides an estimate of the approximate hours needed to complete the requested financial planning services. If Insight Financial Strategists anticipates exceeding the estimated amount of hours required, Insight Financial Strategists will contact you to receive authorization to provide additional services. You will pay in advance a mutually agreed upon retainer that will be available for Insight Financial Strategists to bill hourly fees against for our financial planning services; however, under no circumstances will Insight Financial Strategists require you to pay fees more than \$500 more than six months in advance. The standard billing dates and events of Insight Financial Strategists are the following: (1) the first business day of each month; (2) the date when incurred hourly fees and expenses will cause the retainer balance to be depleted to zero; (3) the date or thereafter that Insight Financial Strategists substantially provides the agreed upon services; and (4) the date the engagement is terminated by either you or Insight Financial Strategists. Upon presentment of the invoice to you, Insight Financial Strategists will deduct the hourly fees due Insight Financial Strategists against your current retainer balance and you are required to pay immediately Insight Financial Strategists any outstanding balance of hourly fees due.

Insight Financial Strategists also provides financial planning services under a fixed fee arrangement. A mutually agreed upon fixed fee is charged for financial planning services under this arrangement. There is a range in the amount of the fixed fee charged by Insight Financial Strategists for financial planning services. The minimum fixed fee is generally \$4,000, and the maximum fixed fee may vary in relation to the complexity of the client's situation and needs. The amount of the fixed fee for your engagement is specified in your financial planning agreement with Insight Financial Strategists. At our sole discretion, you may be required to pay in advance of the fixed fee at the time you execute an agreement with Insight Financial Strategists; however, at no time will Insight Financial Strategists require payment of more than \$500 in fees more than six months in advance. Upon completion and delivery of the financial plan, the fixed fee is considered earned by Insight Financial Strategists and any unpaid amount is immediately due.

To the extent Insight Financial Strategists provides you with general investment recommendations as part of the financial planning services and you implement such investment recommendations through Insight Financial Strategists, we may offer in our agreement with you to waive or reduce the fees for financial planning services.

The financial planning services terminate upon delivery of the written financial plan or upon either party providing the other party with written notice of termination.

You may terminate the financial planning services within five (5) business days of entering into an agreement with Insight Financial Strategists without penalty or fees due. If you terminate the financial planning services after five (5) business days of entering into an agreement, you will be responsible for immediate payment of any financial planning services performed by Insight Financial Strategists prior to the receipt by Insight Financial Strategists of your notice. For financial planning services performed by Insight Financial Strategists under an hourly arrangement, you will pay Insight Financial Strategists for any hourly fees incurred at the rates described above. For financial planning services performed by Insight Financial Strategists under a fixed fee arrangement, you will pay an early termination fee for the hours worked by Insight Financial Strategists multiplied by the hourly rate of specified in your Financial Services Contract. In the event that there is a remaining balance of any fees paid in advance after the deduction of fees from the final invoice, those remaining proceeds will be refunded by Insight Financial Strategists to you.

## Fees for Consulting Services

Insight Financial Strategists provides consulting services under an hourly fee arrangement. An hourly fee is charged by Insight Financial Strategists for consulting services. The hourly fee generally ranges from \$175 to \$450 depending on the services and the complexity of the task. The fee is specified in the Client's Financial Services Contract. Before providing consulting service, Insight Financial Strategists will provide an estimate of the approximate hours needed to complete the consulting services. If Insight Financial Strategists anticipates exceeding the estimated amount of hours required, Insight Financial Strategists will contact you to receive authorization to provide additional services. You may be requested to pay in advance a mutually agreed upon retainer that will be available for Insight Financial Strategists to bill hourly fees against for our consulting services; however, under no circumstances will Insight Financial Strategists require you to pay fees more than \$500 more than six months in advance. The standard billing dates and events of Insight Financial Strategists are the following: (1) the first business day of each month; (2) the date when incurred hourly fees will cause the retainer balance to be depleted to zero; (3) the date or thereafter that Insight Financial Strategists substantially provides the agreed upon services; and (4) the date the engagement is terminated by either you or Insight Financial Strategists. Upon presentment of the invoice to you, Insight Financial Strategists will deduct the hourly fees due Insight Financial Strategists against your current retainer balance and you will immediately pay Insight Financial Strategists any outstanding balance of hourly fees due.

To the extent Insight Financial Strategists provides you with general investment recommendations as part of our consulting services and you implement such investment recommendations through us, Insight Financial Strategists at our discretion may offer to waive or reduce the fee for certain consulting services.

The one-time consulting services will terminate upon completion of the consultation or either party providing the other party with written notice. The "as-needed" consulting services will terminate upon either you or Insight Financial Strategists providing written notice of termination to the other party.

You may terminate the consulting services within five (5) business days of entering into an agreement with Insight Financial Strategists without penalty or fees due. If you terminate the consulting services after five (5) business days of entering into an agreement with Insight Financial Strategists, you will be responsible for immediate payment of any consulting work performed by Insight Financial Strategists prior to the receipt by Insight Financial Strategists of your notice. For consulting services performed by Insight Financial Strategists for any hourly fees incurred at the rates described above. In the event that there is a remaining balance of any fees paid in advance after the deduction of fees from the final invoice, those remaining proceeds will be refunded by Insight Financial Strategists to you.

### **Other Fee Terms for Financial Planning & Consulting Services**

You may pay the investment advisory fees owed for the financial planning services by submitting payment directly (for example, by check) or having the fee deducted from an existing investment account.

If you elect to pay by automatic deduction from an existing investment account, you will provide written authorization to the Custodian and to Insight Financial Strategists for such charge.

You should notify Insight Financial Strategists within ten (10) days of receipt of an invoice if you have questions about or dispute any billing entry.

To the extent Insight Financial Strategists engages an outside professional (i.e. attorney, independent investment adviser or accountant) while providing financial planning and consulting services to you,

Insight Financial Strategists will be responsible for the payment of the fees for the services of such an outside professional, and you will not be required to reimburse Insight Financial Strategists for such payments. To the extent that you personally engage such an outside professional, you will be responsible for the payment of the fees for the services of such an outside professional, and Insight Financial Strategists will not be required to reimburse Client for such payments. Fees for the services of an outside professional (i.e. attorney, independent investment adviser or accountant) will be in addition to and separate from the fees charged by Insight Financial Strategists, and you will be responsible for the payment of the services of such an outside professional. In no event will the services of an outside professional be engaged without your express approval.

All fees paid to Insight Financial Strategists for advisory services are separate and distinct from the fees and expenses charged by mutual funds to their shareholders. These fees and expenses are described in each mutual fund's prospectus. These fees will generally include a management fee, other fund expenses and a possible distribution fee. If the fund also imposes sales charges, you may pay an initial or deferred sales charge.

All fees paid to Insight Financial Strategists for financial planning and consulting services are separate and distinct from the commissions charged by a broker-dealer or asset management fees charged by an investment adviser to implement such recommendations.

It should be noted that lower fees for comparable services may be available from other sources.

#### <u>Newsletters</u>

Newsletters are provided to clients and prospective clients free of charge.

### <u>Seminars</u>

No fees are charged by Insight Financial Strategists for client seminars. However, if we are hired by larger groups, such as corporations, we reserve the right to charge fees to cover the expenses incurred by us for presenting the seminars. In some cases, a seminar may be offered through a third party that may charge an attendance fee to cover their costs. Insight Financial Strategists does not receive payment for these seminars. In these cases, all fees and payment provisions will be fully disclosed to you prior to the seminar being presented.

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

Performance-based fees are defined as fees based on a share of capital gains on or capital appreciation of the assets held in a client's account. *Item* 6 is not applicable to this Disclosure Brochure because we do not charge or accept performance-based fees.

### Item 7 – Types of Clients

Insight Financial Strategists generally provides investment advice to the following types of clients:

- Individuals
- High net worth individuals

- Trusts, estates, or charitable organizations
- Corporations or business entities other than those listed above

You are required to execute a written agreement with Insight Financial Strategists specifying the particular advisory services in order to establish a client arrangement with Insight Financial Strategists.

### Minimum Investment Amounts Required

There are no minimum investment amounts or conditions required for establishing an account managed by Insight Financial Strategists. However, all clients are required to execute an agreement for services in order to establish a client arrangement with Insight Financial Strategists and/or the third-party money manager or the sponsor of third-party money manager platforms.

The minimum fee generally charged for financial planning services provided on an hourly basis is \$450.

The minimum fixed fee generally charged for financial planning services on a fixed fee basis is \$450.

The minimum hourly fee generally charged for consulting services is \$250.

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

### Methods of Analysis

Insight Financial Strategists uses the following methods of analysis in formulating investment advice:

<u>Fundamental</u> – This is a method of evaluating a security by attempting to measure its intrinsic value by examining related economic, financial and other qualitative and quantitative factors. Fundamental analysts attempt to study everything that can affect the security's value, including macroeconomic factors (like the overall economy and industry conditions) and individually specific factors (like the financial condition and management of a company). The end goal of performing fundamental analysis is to produce a value that an investor can compare with the security's current price in hopes of figuring out what sort of position to take with that security (underpriced = buy, overpriced = sell or short). Fundamental analysis is considered to be the opposite of technical analysis. Fundamental analysis is about using real data to evaluate a security's value. Although most analysts use fundamental analysis to value stocks, this method of valuation can be used for just about any type of security.

The risk associated with fundamental analysis is that it is somewhat subjective. While a quantitative approach is possible, fundamental analysis usually entails a qualitative assessment of how market forces interact with one another in their impact on the investment in question. It is possible for those market forces to point in different directions, thus necessitating an interpretation of which forces will be dominant. This interpretation may be wrong, and could therefore lead to an unfavorable investment decision.

There are risks involved in using any analysis method.

To conduct analysis, Insight Financial Strategists gathers information from financial newspapers and magazines, inspection of corporate activities, research materials prepared by others, corporate rating

services, timing services, annual reports, prospectuses and filings with the SEC, and company press releases.

## Investment Strategies

Insight Financial Strategists uses the following investment strategies when managing client assets and/or providing investment advice:

Long term purchases. Investments held at least a year.

Short term purchases. Investments sold within a year.

## Primarily Recommend One Type of Security

Although we may use ETFs in many if not most of our securities selections, we may select other instruments such as mutual funds, stocks, bonds, derivatives and structured product that may be appropriate for each client relative to that client's specific circumstances and needs.

# <u>Risk of Loss</u>

Past performance is not indicative of future results. Therefore, you should never assume that future performance of any specific investment or investment strategy will be profitable. Investing in securities (including stocks, mutual funds, and bonds, etc.) involves risk of loss. Further, depending on the different types of investments there may be varying degrees of risk. You should be prepared to bear investment loss including loss of original principal.

Because of the inherent risk of loss associated with investing, our firm is unable to represent, guarantee, or even imply that our services and methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections or declines. There are certain additional risks associated with investing in securities through our investment management program, as described below:

- <u>Market Risk</u> Either the stock market as a whole, or the value of an individual company, goes down resulting in a decrease in the value of client investments. This is also referred to as systemic risk.
- Equity (stock) market risk Common stocks are susceptible to general stock market fluctuations and to volatile increases and decreases in value as market confidence in and perceptions of their issuers change. If you held common stock, or common stock equivalents, of any given issuer, you would generally be exposed to greater risk than if you held preferred stocks and debt obligations of the issuer.
- Company Risk. When investing in stock positions, there is always a certain level of company or industry specific risk that is inherent in each investment. This is also referred to as unsystematic risk and can be reduced through appropriate diversification. There is the risk that the company will perform poorly or have its value reduced based on factors specific to the company or its industry. For example, if a company's employees go on strike or the company receives unfavorable media attention for its actions, the value of the company may be reduced.
- <u>Fixed Income Risk</u>. When investing in bonds, there is the risk that the issuer will default on the bond and be unable to make payments. Further, individuals who depend on set amounts of periodically paid income face the risk that inflation will erode their spending

power. Fixed-income investors receive regular payments that face the same inflation risk.

- <u>Options Risk</u>. Options on securities may be subject to greater fluctuations in value than an investment in the underlying securities. Purchasing and writing put and call options are highly specialized activities and entail greater than ordinary investment risks.
- <u>ETF and Mutual Fund Risk</u> When investing in an ETF or mutual fund, you will bear additional expenses based on your pro rata share of the ETF's or mutual fund's operating expenses, including the potential duplication of management fees. The risk of owning an ETF or mutual fund generally reflects the risks of owning the underlying securities the ETF or mutual fund holds. You will also incur brokerage costs when purchasing ETFs.
- <u>Management Risk</u> Your investment with our firm varies with the success and failure of our investment strategies, research, analysis and determination of portfolio securities. If our investment strategies do not produce the expected returns, the value of the investment will decrease.

## Item 9 – Disciplinary Information

*Item 9* is not applicable to this Disclosure Brochure because there are no legal or disciplinary events that are material to a client's or prospective client's evaluation of our business or integrity. Clients can obtain the disciplinary history of Insight Financial Strategists and its representatives from the Massachusetts Securities Division upon request.

## Item 10 – Other Financial Industry Activities and Affiliations

Insight Financial Strategists is **not** and does **not** have a related person that is a broker/dealer, municipal securities dealer, government securities dealer or broker, an investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund), another investment adviser or financial planner, a futures commission merchant, commodity pool operator, or commodity trading advisor, a banking or thrift institution, a lawyer or law firm, an insurance company or agency, a pension consultant, a real estate broker or dealer, and a sponsor or syndicator of limited partnerships.

We are an independent registered investment adviser and only provide investment advisory services. We are not engaged in any other business activities and offer no other services except those described in this Disclosure Brochure. However, while we do not sell products or services other than investment advice, our representatives may sell other products or provide services outside of their role as investment adviser representatives with us.

Insight Financial compensates Jason Berube for Client referrals.

### Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading

### Code of Ethics Summary

An investment adviser is considered a fiduciary and has a fiduciary duty to all clients. Insight Financial Strategists has established a Code of Ethics to comply with the requirements of the securities laws and regulations that reflects its fiduciary obligations and those of its supervised persons. The Code of Ethics

also requires compliance with federal securities laws. Insight Financial Strategists' Code of Ethics covers all individuals that are classified as "supervised persons". All employees, officers, directors and investment adviser representatives are classified as supervised persons. Insight Financial Strategists requires its supervised persons to consistently act in your best interest in all advisory activities. Insight Financial Strategists imposes certain requirements on its affiliates and supervised persons to ensure that they meet the firm's fiduciary responsibilities to you. The standard of conduct required is higher than ordinarily required and encountered in commercial business.

This section is intended to provide a summary description of the Code of Ethics of Insight Financial Strategists. If you wish to review the Code of Ethics in its entirety, you should send us a written request and upon receipt of your request, we will promptly provide a copy of the Code of Ethics to you.

## Affiliate and Employee Personal Securities Transactions Disclosure

Insight Financial Strategists or associated persons of the firm may buy or sell for their personal accounts, investment products identical to those recommended to clients. This creates a potential conflict of interest. It is the express policy of Insight Financial Strategists that all persons associated in any manner with our firm must place clients' interests ahead of their own when implementing personal investments. Insight Financial Strategists and its associated persons will not buy or sell securities for their personal account(s) where their decision is derived, in whole or in part, by information obtained as a result of employment or association with our firm unless the information is also available to the investing public upon reasonable inquiry.

We are now and will continue to be in compliance with applicable state and federal rules and regulations. To prevent conflicts of interest, we have developed written supervisory procedures that include personal investment and trading policies for our representatives, employees and their immediate family members (collectively, associated persons):

- Associated persons cannot prefer their own interests to that of the client.
- Associated persons cannot purchase or sell any security for their personal accounts prior to implementing transactions for client accounts.
- Associated persons cannot buy or sell securities for their personal accounts when those decisions are based on information obtained as a result of their employment, unless that information is also available to the investing public upon reasonable inquiry.
- Associated persons are prohibited from purchasing or selling securities of companies in which any client is deemed an "insider".
- Associated persons are discouraged from conducting frequent personal trading.
- Associated persons are generally prohibited from serving as board members of publicly traded companies unless an exception has been granted to the Chief Compliance Officer of Insight Financial Strategists.

Any associated person not observing our policies is subject to sanctions up to and including termination.

### Item 12 – Brokerage Practices

Clients are under no obligation to act on the financial planning recommendations of Insight Financial Strategists. If the firm assists in the implementation of any recommendations, we are responsible to

ensure that the client receives the best execution possible. Best execution does not necessarily mean that clients receive the lowest possible commission costs but that the qualitative execution is best. In other words, all conditions considered, the transaction execution is in your best interest. When considering best execution, we look at a number of factors besides prices and rates including, but not limited to:

- Execution capabilities (e.g., market expertise, ease/reliability/timeliness of execution, responsiveness, integration with our existing systems, ease of monitoring investments)
- Products and services offered (e.g., investment programs, back office services, technology, regulatory compliance assistance, research and analytic services)
- Financial strength, stability and responsibility
- Reputation and integrity
- Ability to maintain confidentiality

We exercise reasonable due diligence to make certain that best execution is obtained for all clients when implementing any transaction by considering the back office services, technology and pricing of services offered.

## Brokerage Recommendations

If we assist you in the implementation of any recommendations, Assetmark Trust Company, FOLIO Institutional, Interactive Broker or another selected broker dealer will be used as the broker/dealer for your account. Insight Financial Strategists is independently owned and operated and not affiliated with Assetmark Trust Company or any other broker dealer.

# Directed Brokerage

Clients are allowed to select the broker-dealer that will be used for their accounts. Clients directing the use of a particular broker/dealer or other custodian must understand that we may not be able to obtain the best prices and execution for the transaction. Under a client-directed brokerage arrangement, clients may receive less favorable prices than would otherwise be the case if the client had not designated a particular broker/dealer or custodian. Directed brokerage account trades are generally placed by Insight Financial Strategists after effecting trades for other clients of Insight Financial Strategists. In the event that a client directs Insight Financial Strategists to use a particular broker or dealer, Insight Financial Strategists may not be authorized to negotiate commissions and may be unable to obtain volume discounts or best execution. In addition, under these circumstances a disparity in commission charges may exist between the commissions charged to clients who direct Insight Financial Strategists to use a particular broker or dealer.

# Soft Dollar Benefits

An investment adviser receives soft dollar benefits from a broker-dealer when the investment adviser receives research or other products and services in exchange for client securities transactions or maintaining an account balance with the broker-dealer.

Insight Financial Strategists does not have a soft dollar agreement with a broker-dealer or a third-party.

# Handling Trade Errors

Insight Financial Strategists has implemented procedures designed to prevent trade errors; however,

trade errors in client accounts cannot always be avoided. Consistent with its fiduciary duty, it is the policy of Insight Financial Strategists to correct trade errors in a manner that is in the best interest of the client. In cases where the client causes the trade error, the client is responsible for any loss resulting from the correction. Depending on the specific circumstances of the trade error, the client may not be able to receive any gains generated as a result of the error correction. In all situations where the client does not cause the trade error, the client is made whole and any loss resulting from the trade error is absorbed by Insight Financial Strategists if the error is caused by Insight Financial Strategists. If the error is caused by the broker-dealer, the broker-dealer is responsible for handling the trade error. If an investment gain results from the correcting trade, the gain remains in the client's account unless the same error involved other client account(s) that should also receive the gains. It is not permissible for all clients to retain the gain. Insight Financial Strategists may also confer with a client to determine if the client should forego the gain (e.g., due to tax reasons).

Insight Financial Strategists will never benefit or profit from trade errors.

# Block Trading Policy

Investment advisors may elect to purchase or sell the same securities for several clients at approximately the same time when they believe such action may prove advantageous to clients. This process is referred to as aggregating orders, batch trading or block trading. Insight Financial Strategists does not engage in block trading.

It should be noted that implementing trades on a block or aggregate basis may be less expensive for client accounts; however, it is our trading policy is to implement all client orders on an individual basis. Therefore, we do not aggregate or "block" client transactions. Considering the types of investments we hold in advisory client accounts, we do not believe clients are hindered in any way because we trade accounts individually. This is because we develop individualized investment strategies for clients and holdings will vary. Our strategies are primarily developed for the long-term and minor differences in price execution are not material to our overall investment strategy.

### Agency Cross Transactions

Our associated persons are prohibited from engaging in agency cross transactions, meaning we cannot act as brokers for both the sale and purchase of a single security between two different clients and cannot receive compensation in the form of an agency cross commission or principal mark-up for the trades.

### Item 13 - Review of Accounts

### Account Reviews and Reviewers

Managed accounts are reviewed at least quarterly. While the calendar is the main triggering factor, reviews can also be conducted at your request. Account reviews will include investment strategy and objectives review and making a change if strategy and objectives have changed. Reviews are conducted by Christoph Chen, with reviews performed in accordance with your investment goals and objectives.

Our financial planning services terminate upon the presentation of the written plan. Our financial planning and consulting services do not include monitoring the investments of your account(s), and therefore, there is no ongoing review of your account(s) under such services.

### Statements and Reports

For our asset management services, you are provided with transaction confirmation notices and regular

quarterly account statements directly from the qualified custodian.

Financial planning clients do not receive any report other than the written plan originally contracted for and provided by Insight Financial Strategists.

You are encouraged to always compare any reports or statements provided by us, a sub-adviser or thirdparty money manager against the account statements delivered from the qualified custodian. When you have questions about your account statement, you should contact our firm and the qualified custodian preparing the statement.

### Item 14 – Client Referrals and Other Compensation

Insight Financial Strategists does not directly or indirectly compensate any person for client referrals.

The only compensation received from advisory services is the fees charged for providing investment advisory services as described in *Item 5* of this Disclosure Brochure. Insight Financial Strategists receives no other forms of compensation in connection with providing investment advice. *Please see Item 5, Fees and Compensation, Item 10, Other Financial Industry Activities and Affiliations and Item 12, Brokerage Practices, for additional discussion concerning other compensation.* 

We may from time to time receive expense reimbursement for travel and/or marketing expenses from distributors of investment products. Travel expense reimbursements are typically a result of attendance at due diligence and/or investment training events hosted by product sponsors. Marketing expense reimbursements are typically the result of informal expense sharing arrangements in which product sponsors may underwrite costs incurred for marketing such as client appreciation events, advertising, publishing, and seminar expenses. Although receipt of these travel and marketing expense reimbursements are not predicated upon specific sales quotas, the product sponsor reimbursements are typically made by those sponsors for which sales have been made or for which it is anticipated sales will be made. This creates a conflict of interest in that there is an incentive to recommend certain products and investments based on the receipt of this compensation instead of what is in the best interest of our clients. We attempt to control for this conflict by always basing investment decisions on the individual needs of our clients.

### Item 15 – Custody

Custody, as it applies to investment advisors, has been defined by regulators as having access or control over client funds and/or securities. In other words, custody is not limited to physically holding client funds and securities. If an investment adviser has the ability to access or control client funds or securities, the investment adviser is deemed to have custody and must ensure proper procedures are implemented.

Insight Financial Strategists is deemed to have custody of client funds and securities whenever Insight Financial Strategists is given the authority to have fees deducted directly from client accounts. However, this is the only form of custody Insight Financial Strategists will ever maintain. It should be noted that authorization to trade in client accounts is not deemed by regulators to be custody.

For accounts in which Insight Financial Strategists is deemed to have custody, we have established procedures to ensure all client funds and securities are held at a qualified custodian in a separate account for each client under that client's name. Clients or an independent representative of the client will direct, in writing, the establishment of all accounts and therefore are aware of the qualified custodian's name, address and the manner in which the funds or securities are maintained. Finally, account statements are delivered directly from the qualified custodian to each client, or the client's independent representative, at least quarterly. Clients should carefully review those statements and are urged to compare the

statements against reports received from Insight Financial Strategists. When clients have questions about their account statements, they should contact Insight Financial Strategists or the qualified custodian preparing the statement.

When fees are deducted from an account, Insight Financial Strategists is responsible for calculating the fee and delivering instructions to the custodian. At the same time Insight Financial Strategists instructs the custodian to deduct fees from your account; Insight Financial Strategists will send you an invoice itemizing the fee. Itemization will include the formula used to calculate the fee, the amount of assets under management the fee is based on, and the time period covered by the fee.

## Item 16 – Investment Discretion

When providing asset management services, Foundational Financial Advisors maintains trading authorization over your Account and can provide management services on a **discretionary** basis.

When discretionary authority over your account is granted, you will be required to execute a Limited Power of Attorney (LPOA), naming Insight Financial Strategists as your attorney and agent in fact. The LPOA will grant Insight Financial Strategists full authority to buy, sell, or otherwise effect investment transactions involving the assets in your name in the discretionary account.

If your accounts are managed on a non-discretionary basis, this means we will be required to contact you prior to implementing changes in your account. Therefore, you will be contacted and required to accept or reject our investment recommendations including:

- The security being recommended
- The number of shares or units
- Whether to buy or sell

Once the above factors are agreed upon, we will be responsible for making decisions regarding the timing of buying or selling an investment and the price at which the investment is bought or sold. If your accounts are managed on a non-discretionary basis, you need to know that if you are not able to be reached or are slow to respond to our request, it can have an adverse impact on the timing of trade implementations and we may not achieve the optimal trading price.

### Item 17 – Voting Client Securities

Insight Financial Strategists does not vote proxies on behalf of Clients. We have determined that taking on the responsibilities for voting client securities does not add enough value to the services provided to you to justify the additional compliance and regulatory costs associated with voting client securities. Therefore, it is your responsibility to vote all proxies for securities held in Account.

You will receive proxies directly from the qualified custodian or transfer agent; we will not provide you with the proxies. You are encouraged to read through the information provided with the proxy-voting documents and make a determination based on the information provided.

### Item 18 – Financial Information

This *Item 18* is not applicable to this brochure. Insight Financial Strategists does not require or solicit prepayment of more than \$500 in fees per client, six months or more in advance. Therefore, we are not

required to include a balance sheet for the most recent fiscal year. We are not subject to a financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients. Finally, Insight Financial Strategists has not been the subject of a bankruptcy petition at any time.

#### Item 19 – Requirements for State-Registered Advisers

#### Executive Officer and Management Personnel

Christoph Chen; Born: 1960, CRD # 5226577

#### **Educational Background:**

University of Rochester, BA 1982 University of Texas at Austin, MBA 1988

#### Business Experience:

Insight Financial Strategists, Managing Member, 09/2012 to Present Lincoln Financial Group, Registered Representative, 07/2008 to 08/2012 Jefferson Pilot Securities Corp, Registered Representative, 05/2008 to 07/2008 Edward Jones Investment Representative, 09/2006 to 04/2008 Ecsplicite, Trainer, 08/2006 to 09/2006 Self Employed, Consultant, 02/2006 to 09/2006 SECUREAIR, CEO, 06/2005 to 01/2006

#### **Other Business Activities**

See Item 10 – Other Financial Industry Activities and Affiliations. *No Performance Based Fees* 

As previously disclosed in *Item 6*, Insight Financial Strategists does not charge or accept performancebased fees.

### No Arbitrations

Insight Financial Strategists or any of its associated persons have not been the subject of any client arbitrations or similar legal disputes.

### <u>Material Relationship Maintained by this Advisory Business or Management persons with Issuers</u> <u>of Securities</u>

None to report

### **Business Continuity Plan**

Insight Financial Strategists has a business continuity and contingency plan in place designed to respond to significant business disruptions. These disruptions can be both internal and external. Internal disruptions will impact our ability to communicate and do business, such as a fire in the office building. External disruptions will prevent the operation of the securities markets or the operations of a number of firms, such as earthquakes, wildfires, hurricanes, terrorist attack or other wide-scale, regional disruptions.

Our continuity and contingency plan has been developed to safeguard employees' lives and firm property, to allow a method of making financial and operational assessments, to quickly recover and resume business operations, to protect books and records, and to allow clients to continue transacting business.

The plan includes the following:

- Alternate locations to conduct business;
- Hard and electronic back-ups of records;
- Alternative means of communications with employees, clients, critical business constituents and regulators; and
- Details on the firms' employee succession plan

Our business continuity and contingency plan is reviewed and updated on a regular basis to ensure that the policies in place are sufficient and operational.

# **Customer Privacy Policy Notice**

**Commitment to Your Private Information**: Insight Financial Strategists has a long standing policy of protecting the confidentiality and security information we collect about our clients. We do not, and will not, share nonpublic personal information about you ("Information") with outside third parties without your consent, except for the specific purposes described below. This notice has been provided to you to describe the Information we may gather and the situations under which we may need to share it. By signing the Financial Planning Services Agreement Contract, you are making an affirmative declaration of permission to disclose such information, under the policy further outlined below.

Why We Collect and How We Use Information. We limit the collection and use of Information within our firm to only those individuals associated or employed with us that must have Information to provide financial services to you. Such services include maintaining your accounts, processing transaction requests, providing financial planning, financial consultation, and other services described in our Form ADV.

**How We Gather Information**. We get most Information directly from you when you provide us with information from any of the following sources:

- Applications or forms (for example: name, address, social security number, birth date, assets, income, financial history)
- Transactional activity in your account (for example: trading history and account balances)
- Information services and consumer reporting sources (for example: to verify your identity or to assess your credit history)
- Information provided by you through software that we use to perform our work
- Other sources with your consent (for example: your insurance professional, attorney, or accountant)

**How We Protect Information**. Our employees and affiliated persons are required to protect the confidentiality of Information and to comply with our stated policies. They may access Information only when there is an acceptable reason to do so, such as to service your account or provide you with financial services. Employees who violate our Privacy Policy are subject to disciplinary action, up to and including termination from employment with us. We also maintain physical, electronic, and procedural safeguards to protect information, which comply with applicable SEC, state, and federal laws.

**Sharing Information with Other Companies Permitted Under Law**. We do not disclose Information obtained in the course of our practice unless as affirmatively consented to by you in advance, except as required or permitted under law. With your prior consent, permitted disclosures include, for instance, providing information to unrelated third parties who need to know such Information in order to assist us with the providing services to you. Unrelated third parties may include broker/dealers, mutual fund companies, insurance companies, service providers and the custodian with which your assets are held.

In such situations, we stress the confidential nature of information being shared.

**Former Customers**. Even if we cease to provide you with financial products or services, our Privacy Policy will continue to apply to you and we will continue to treat your nonpublic information with strict confidentiality.

## FORM ADV PART 2B BROCHURE SUPPLEMENT – Christoph Chen

Item 1 - Cover Page

Christoph Chen Insight Financial Strategists, LLC Insight Financial Strategists, LLC 1349 Centre Street Newton, MA 02459 781-489-3998

Date of Supplement: February 28, 2020

This brochure supplement provides information about Christoph Chen that supplements the Insight Financial Strategists, LLC. ("Insight Financial Strategists") disclosure brochure. You should have received a copy of that brochure. Please contact Christoph Chen at (781) 489-3014 if you did not receive Insight Financial Strategists' brochure or if you have any questions about the contents of this supplement.

Additional information about Christoph Chen is available on the SEC's website at <u>www.adviserinfo.sec.gov</u>.

### Item 2 – Educational Background and Business Experience

### Christoph Chen

Born: 1960; CRD # 5226577

### Post-Secondary Educational Background:

University of Rochester, BA 1982 University of Texas at Austin, MBA 1988

#### **Professional Designations:**

<u>CFP</u> - 2012

> The CERTIFIED FINANCIAL PLANNER<sup>™</sup>, CFP<sup>®</sup> and federally registered CFP (with flame design) marks (collectively, the "CFP<sup>®</sup> marks") are professional certification marks granted in the United

States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP<sup>®</sup> certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP<sup>®</sup> 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<sup>®</sup> certification in the United States.

To attain the right to use the CFP<sup>®</sup> 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 risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination Pass the comprehensive CFP<sup>®</sup> 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<sup>®</sup> 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<sup>®</sup> 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<sup>®</sup> professionals provide financial planning services at a fiduciary standard of care. This means CFP<sup>®</sup> professionals must provide financial planning services in the best interests of their clients.

CFP<sup>®</sup> 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<sup>®</sup> certification.

#### **Business Background:**

Insight Financial Strategists, Managing Member, 09/2012 to Present Lincoln Financial Group, Registered Representative, 07/2008 to 08/2012 Jefferson Pilot Securities Corp, Registered Representative, 05/2008 to 07/2008 Edward Jones Investment Representative, 09/2006 to 04/2008 Ecsplicite, Trainer, 08/2006 to 09/2006 Self Employed, Consultant, 02/2006 to 09/2006 SECUREAIR, CEO, 06/2005 to 01/2006

### Item 3 – Disciplinary Information

Christoph Chen has no legal or disciplinary events to report.

#### Item 4 – Other Business Activities

See Item 10 – Other Financial Industry Activities and Affiliations.

#### Item 5 – Additional Compensation

Christoph Chen does not receive any economic benefit from a non-advisory client for the provision of investment advisory services.

#### Item 6 - Supervision

Christoph Chen is the Chief Compliance Officer of Insight Financial Strategists. He is responsible for overseeing and enforcing the firm's compliance programs that have been established to monitor and supervise the activities and services provided by the firm and its representatives. Christoph Chen can be contacted at (781) 489-3014.

#### Item 7 – Requirements for State-Registered Advisers

Christoph Chen has not been involved in an arbitration award and has not been found liable in an arbitration claim alleging damages in excess of \$2,500. He has not been involved in any award or found liable in any civil, self-regulatory organization, or administrative proceeding. Additionally, he has not been the subject of a bankruptcy petition.

### FORM ADV PART 2B BROCHURE SUPPLEMENT - James C. Wood, Jr.

#### Item 1 - Cover Page

James C. Wood, Jr. Insight Financial Strategists, LLC 1349 Centre Street Newton, MA 02459 781-489-3998 www.insightfinancialstrategists.com

Date of Supplement: February 28, 2020

This brochure supplement provides information about James C. Wood, Jr. that supplements the Insight Financial Strategists, LLC ("Insight Financial Strategists") disclosure brochure. You should have received a copy of that brochure. Please contact Christoph Chen at 781-489-3014 if you did not receive Insight Financial Strategists' brochure or if you have any questions about the contents of this supplement.

Additional information about James C. Wood, Jr. is available on the SEC's website at <u>www.adviserinfo.sec.gov</u>.

#### Item 2 – Educational Background and Business Experience

James C. Wood, Jr. Born: 1937, CRD # 6484814

#### **Post Secondary Educational Background:** Virginia Military Institute, Bachelor's in Electrical Engineering: 1959

#### **Business Background:**

Insight Financial Strategists, Investment Advisor Representative, 04/2015 to Present; Electron Processing Systems, L.L.C., Managing Partner, 08/2008 to 12/2015; and Electron Processing Systems, Inc., CEO & V.P. of Marketing, 07/1995 to 07/2008.

#### Item 3 – Disciplinary Information

James C. Wood, Jr. has no legal or disciplinary events to report.

#### Item 4 – Other Business Activities

None.

#### Item 5 – Additional Compensation

James C. Wood, Jr. does not receive any economic benefit from a non-advisory client for the provision of investment advisory services.

#### Item 6 – Supervision

Christoph Chen is the Chief Compliance Officer of Insight Financial Strategists. He is responsible for overseeing and enforcing the firm's compliance programs that have been established to monitor and supervise the activities and services provided by the firm and its representatives, including James C. Wood, Jr. Christoph Chen can be contacted at 781-489-3994.

# Item 7 – Requirements for State-Registered Advisers

James C. Wood, Jr. has not been involved in an arbitration award and has not been found liable in an arbitration claim alleging damages in excess of \$2,500. He has not been involved in any award or found liable in any civil, self-regulatory organization, or administrative proceeding. Additionally, he has not been the subject of a bankruptcy petition.