

**Brochure**

**Form ADV Part 2A**

**Item 1 - Cover Page**



**METANOIA FINANCIAL**

**Metanoia Financial, LLC**  
**CRD# 152366**

507 Governors Court  
Philadelphia, PA 19146

(404) 585-1011

**[www.MetanoiaFinancial.com](http://www.MetanoiaFinancial.com)**

**March 7, 2016**

This brochure provides information about the qualifications and business practices of Metanoia Financial, LLC. If you have any questions about the contents of this brochure, please contact us at (404) 585-1011 or [bobby@metanoiafinancial.com](mailto:bobby@metanoiafinancial.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state authority.

Metanoia Financial, LLC is an investment advisory firm registered with the appropriate regulatory authority. Registration does not imply a certain level of skill or training. Additional information about Metanoia Financial, LLC also is available on the SEC's website at [www.AdviserInfo.sec.gov](http://www.AdviserInfo.sec.gov).

**Item 2 - Material Changes**

This Brochure is prepared in the revised format required beginning in 2011. Registered Investment Advisers are required to use this format to inform clients of the nature of advisory services provided, types of clients served, fees charged, potential conflicts of interest and other information. Various state regulations require us to either deliver or offer to deliver the Brochure at least annually, and we will comply with these regulations. The Brochure requirements include providing a Summary of Material Changes (the "Summary") reflecting any material changes to our policies, practices, or conflicts of interest made since our last required "annual update" filing. In the event of any material changes, such Summary is provided to all clients within 120 days of our fiscal year-end. Our last annual update was filed on February 9, 2015. Of course the complete Brochure is available to clients at any time upon request.

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#### ***Item 4 - Advisory Business***

##### General Information

Metanoia Financial, LLC (“Metanoia”) was formed in 2009 and provides portfolio management and financial planning services to its clients.

Robert J. Cremins, III is the sole principal owner of Metanoia. Please see ***Brochure Supplement***, Exhibit A, for more information on Mr. Cremins.

As of December 31, 2015, Metanoia managed \$11,581,745 on a discretionary basis, and no assets on a non-discretionary basis. Metanoia does not participate in or offer any wrap programs.

#### **SERVICES PROVIDED**

At the outset of each client relationship, Metanoia spends time with the client, asking questions, discussing the client’s investment experience and financial circumstances, and reviewing options for the client. Based on its reviews, Metanoia generally develops with each client:

- a financial outline for the client based on the client’s financial circumstances and goals, and the client’s risk tolerance level (the “Financial Profile” or “Profile”); and
- the client’s investment objectives and guidelines (the “Investment Plan” or “Plan”).

The Financial Profile is a reflection of the client’s current financial picture and a look to the future goals of the client. The Investment Plan outlines the types of investments Metanoia will make on behalf of the client to meet those goals. The Profile and the Plan are discussed regularly with each client, but are not necessarily written documents.

##### Portfolio Management

As described above, at the beginning of a client relationship, Metanoia meets with the client, gathers information, and performs research and analysis as necessary to develop the client’s Investment Plan. The Investment Plan will be updated from time to time when requested by the client, or when determined to be necessary or advisable by Metanoia based on updates to the client’s financial or other circumstances.

To implement the client’s Investment Plan, Metanoia will manage the client’s investment portfolio on a discretionary basis. As a discretionary investment adviser, Metanoia will have the authority to supervise and direct the portfolio without prior consultation with the client.

Notwithstanding the foregoing, clients may impose certain written restrictions on Metanoia in the management of their investment portfolios, such as prohibiting the inclusion of certain types of investments in an investment portfolio or prohibiting the sale of certain investments held in the account at the commencement of the relationship. Each client should note, however, that restrictions imposed by a client may adversely affect the composition and performance of the client’s investment portfolio. Each client should also note that his or her investment portfolio is treated individually by giving consideration to each purchase or sale for the client’s account. For these and other reasons, performance of client investment portfolios within the same investment

objectives, goals and/or risk tolerance may differ and clients should not expect that the composition or performance of their investment portfolios would necessarily be consistent with similar clients of Metanoia.

#### Financial Planning Services

Metanoia offers limited financial planning services to those clients in need of such service in conjunction with Portfolio Management services. Metanoia's limited financial planning services normally address areas such as Budget, Insurance Reviews, Investment Reviews, Estate Planning, Debt Review and Quarterly Review Meeting. The goal of this service is to assess the financial circumstances of the client in order to more effectively develop the client's Investment Plan. Financial planning is not offered as a stand-alone service or for a separate fee, but is provided in conjunction with the management of the portfolio.

#### ***Item 5 - Fees and Compensation***

##### General Fee Information

Fees paid to Metanoia are exclusive of all custodial and transaction costs paid to the client's custodian, brokers or other third party consultants. Please see ***Item 12 - Brokerage Practices*** for additional information. Fees paid to Metanoia are also separate and distinct from the fees and expenses charged by mutual funds, ETFs (exchange traded funds) or other investment pools to their shareholders (generally including a management fee and fund expenses, as described in each fund's prospectus or offering materials). The client should review all fees charged by funds, brokers, Metanoia and others to fully understand the total amount of fees paid by the client for investment and financial-related services.

##### Portfolio Management Fees

The annual fee schedule, based on a percentage of assets under management, is as follows:

First \$1,000,000	1.00%
Next \$2,000,000	0.80%
Balance above \$3,000,000	0.60%

The minimum portfolio value is generally set at \$100,000. The minimum annual fee for any portfolio is \$1,000. For portfolios that fall below the minimum, a monthly retainer fee will be imposed to adjust the annual fee to \$1,000. Metanoia may, at its discretion, make exceptions to the foregoing or negotiate special fee arrangements where Metanoia deems it appropriate under the circumstances.

Portfolio management fees are generally payable quarterly, in advance. If management begins after the start of a quarter, fees will be prorated accordingly. With written client authorization and unless other arrangements are made, fees are normally debited directly from client account(s). To effect the fee deduction, the custodian will be given written notice of the amount of the fees to be deducted. Metanoia will also provide clients with a written itemized invoice, including any formulas used to calculate the fee, the time period covered by the fee, and the amount of assets under management on which the fee was based.

If a client receives Metanoia's Brochure less than 48 hours prior to the date of execution of the Investment Management Agreement ("Agreement"), the client has the option to terminate the Agreement without penalty within five business days after the date of execution. Otherwise, either Metanoia or the client may terminate their Agreement at any time, subject to any written notice

requirements in the Agreement. In the event of termination, any paid but unearned fees will be promptly refunded to the client based on the number of days that the account was managed, and any fees due to Metanoia from the client will be invoiced or deducted from the client's account prior to termination.

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

Metanoia does not have any performance-based fee arrangements. "Side by Side Management" refers to a situation in which the same firm manages accounts that are billed based on a percentage of assets under management and at the same time manages other accounts for which fees are assessed on a performance fee basis. Because Metanoia has no performance-based fee accounts, it has no side-by-side management.

#### ***Item 7 - Types of Clients***

Metanoia serves individuals, trusts, and estates. With some exceptions, the minimum portfolio value eligible for conventional investment advisory services is \$100,000, and the annual minimum fee charged is \$1,000. Under certain circumstances and in its sole discretion, Metanoia may negotiate such minimums.

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

##### Methods of Analysis

In accordance with the Investment Plan, Metanoia will primarily invest in mutual funds and, to a lesser extent ETFs, and common stocks for clients.

Mutual funds and ETFs are generally evaluated and selected based on a variety of factors, including, without limitation, past performance, fee structure, portfolio manager, fund sponsor, overall ratings for safety and returns, and other factors.

In selecting individual stocks for an account, Metanoia generally applies traditional fundamental analysis including, without limitation, the following factors:

- Financial strength ratios;
- Price-to-earnings ratios;
- Dividend yields; and
- Growth rate-to-price earnings ratios

Metanoia may also incorporate other methods of analysis, such as technical analysis, which involves studying past price patterns and trends in the financial markets to predict the direction of both the overall market and specific stocks.

##### Investment Strategies:

Metanoia's strategic approach is to invest each portfolio in accordance with the Plan that has been developed specifically for each client. Metanoia considers itself a long-term, growth, income and capital preservation investor.

### Risk of Loss

While Metanoia seeks to diversify clients' investment portfolios across various asset classes consistent with their Investment Plans in an effort to reduce risk of loss, all investment portfolios are subject to risks. Accordingly, there can be no assurance that client investment portfolios will be able to fully meet their investment objectives and goals, or that investments will not lose money.

Below is a description of several of the principal risks that client investment portfolios face.

*Management Risks.* While Metanoia manages client investment portfolios based on Metanoia's experience, research and proprietary methods, the value of client investment portfolios will change daily based on the performance of the underlying securities in which they are invested. Accordingly, client investment portfolios are subject to the risk that Metanoia allocates client assets to individual securities and/or asset classes that are adversely affected by unanticipated market movements, and the risk that Metanoia's specific investment choices could underperform their relevant indexes.

*Risks of Investments in Mutual Funds, ETFs and Other Investment Pools.* As described above, Metanoia will generally invest client portfolios in mutual funds, ETFs and other investment pools ("pooled investment funds"). Investments in pooled investment funds are generally less risky than investing in individual securities because of their diversified portfolios; however, these investments are still subject to risks associated with the markets in which they invest. In addition, pooled investment funds' success will be related to the skills of their particular managers and their performance in managing their funds. Pooled investment funds are also subject to risks due to regulatory restrictions applicable to registered investment companies under the Investment Company Act of 1940.

*Equity Market Risks.* Metanoia may invest portions of client assets directly into equity investments, primarily pooled investment funds that invest in the stock market. As noted above, while pooled investments have diversified portfolios that may make them less risky than investments in individual securities, funds that invest in stocks and other equity securities are nevertheless subject to the risks of the stock market. These risks include, without limitation, the risks that stock values will decline due to daily fluctuations in the markets, and that stock values will decline over longer periods (e.g., bear markets) due to general market declines in the stock prices for all companies, regardless of any individual security's prospects.

*Fixed Income Risks.* Metanoia may invest portions of client assets directly into fixed income instruments, such as bonds and notes, or may invest in pooled investment funds that invest in bonds and notes. While investing in fixed income instruments, either directly or through pooled investment funds, is generally less volatile than investing in stock (equity) markets, fixed income investments nevertheless are subject to risks. These risks include, without limitation, interest rate risks (risks that changes in interest rates will devalue the investments), credit risks (risks of default by borrowers), or maturity risk (risks that bonds or notes will change value from the time of issuance to maturity).

*Foreign Securities Risks.* Metanoia may invest portions of client assets into pooled investment funds that invest internationally. While foreign investments are important to the diversification of client investment portfolios, they carry risks that may be different from U.S. investments. For example, foreign investments may not be subject to uniform audit, financial reporting or disclosure standards, practices or requirements comparable to those found in the U.S. Foreign investments

are also subject to foreign withholding taxes and the risk of adverse changes in investment or exchange control regulations. Finally, foreign investments may involve currency risk, which is the risk that the value of the foreign security will decrease due to changes in the relative value of the U.S. dollar and the security's underlying foreign currency.

### ***Item 9 - Disciplinary Information***

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to a client's evaluation of Metanoia or the integrity of Metanoia's management. Metanoia has no disciplinary events to report.

### ***Item 10 - Other Financial Industry Activities and Affiliations***

Neither Metanoia nor its Management Person has any other financial industry activities or affiliations to report.

### ***Item 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading***

#### **Code of Ethics and Personal Trading**

Metanoia has adopted a Code of Ethics ("the Code"), the full text of which is available to you upon request. Metanoia's Code has several goals. First, the Code is designed to assist Metanoia in complying with applicable laws and regulations governing its investment advisory business. Under the Investment Advisers Act of 1940, Metanoia owes fiduciary duties to its clients. Pursuant to these fiduciary duties, the Code requires persons associated with Metanoia (managers, officers and employees) to act with honesty, good faith and fair dealing in working with clients. In addition, the Code prohibits such associated persons from trading or otherwise acting on insider information.

Next, the Code sets forth guidelines for professional standards for Metanoia's associated persons. Under the Code's Professional Standards, Metanoia expects its associated persons to put the interests of its clients first, ahead of personal interests. In this regard, Metanoia associated persons are not to take inappropriate advantage of their positions in relation to Metanoia clients.

Third, the Code sets forth policies and procedures to monitor and review the personal trading activities of associated persons. From time to time, Metanoia's associated persons may invest in the same securities recommended to clients. Under its Code, Metanoia has adopted procedures designed to reduce or eliminate conflicts of interest that this could potentially cause. The Code's personal trading policies include procedures for limitations on personal securities transactions of associated persons, reporting and review of such trading and pre-clearance of certain types of personal trading activities. These policies are designed to discourage and prohibit personal trading that would disadvantage clients. The Code also provides for disciplinary action as appropriate for violations.

#### **Participation or Interest in Client Transactions**

As outlined above, Metanoia has adopted procedures to protect client interests when its associated persons invest in the same securities as those selected for or recommended to clients. In the event of any identified potential trading conflicts of interest, Metanoia's goal is to place client interests first.

Consistent with the foregoing, Metanoia maintains policies regarding participation in initial public offerings ("IPO"s) and private placements in order to comply with applicable laws and avoid conflicts with client transactions.

Finally, if associated persons trade with client accounts (i.e., in a bundled or aggregated trade), and the trade is not filled in its entirety, the associated person's shares will be removed from the block, and the balance of shares will be allocated among client accounts in accordance with Metanoia's written policy.

### ***Item 12 - Brokerage Practices***

#### **Best Execution and Benefits of Brokerage Selection**

When given discretion to select the brokerage firm that will execute orders in client accounts, Metanoia seeks "best execution" for client trades, which is a combination of a number of factors, including, without limitation, quality of execution, services provided and commission rates. Therefore, Metanoia may use or recommend the use of brokers who do not charge the lowest available commission in the recognition of research and securities transaction services, or quality of execution. Research services received with transactions may include proprietary or third party research (or any combination), and may be used in servicing any or all of Metanoia's clients. Therefore, research services received may not be used for the account for which the particular transaction was effected.

Metanoia participates in the institutional advisor program (the "Program") offered by TD Ameritrade Institutional a division of TD Ameritrade Inc., member FINRA/SIPC/NFA ("TD Ameritrade"). TD Ameritrade offers its Program to independent investment advisers. The Program includes such services as custody of securities, trade execution, clearance and settlement of transactions. Metanoia receives some benefits from TD Ameritrade through its participation in the Program. Metanoia is independently owned and operated and is not affiliated with TD Ameritrade.

Metanoia recommends TD Ameritrade to clients for custody and brokerage services. While there is no direct link between Metanoia's participation in the Program and the investment advice it gives to its clients, through its participation in the Program Metanoia receives economic benefits that are typically not available to TD Ameritrade retail investors. These benefits generally include, without limitation, the following products and services (provided without cost or at a discount): receipt of duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving Program participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have advisory fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to Metanoia by third party vendors. TD Ameritrade may also pay for business consulting and professional services received by Metanoia's related persons. These services are not soft dollar arrangements, but are part of the institutional platform offered by TD Ameritrade.

Some of the products and services made available by TD Ameritrade through the Program may benefit Metanoia but may not directly benefit its client accounts. These products or services may assist Metanoia in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help Metanoia manage and further develop its business enterprise. The benefits received by Metanoia or its personnel through participation in the Program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, Metanoia

endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by Metanoia or its related persons in and of itself creates a potential conflict of interest and may indirectly influence Metanoia's choice of TD Ameritrade for custody and brokerage services.

#### Directed Brokerage

Clients may direct Metanoia to use a particular broker for custodial or transaction services on behalf of the client's portfolio. In directed brokerage arrangements, the client is responsible for negotiating the commission rates and other fees to be paid to the broker. Accordingly, a client who directs brokerage should consider whether such designation may result in certain costs or disadvantages to the client, either because the client may pay higher commissions or obtain less favorable execution, or the designation limits the investment options available to the client.

The arrangement that Metanoia has with TD Ameritrade is designed to maximize efficiency and to be cost effective. By directing brokerage arrangements, the client acknowledges that these economies of scale and levels of efficiency are generally compromised when alternative brokers are used. While every effort is made to treat clients fairly over time, the fact that a client chooses to use the brokerage and/or custodial services of these alternative service providers can in fact result in a certain degree of delay in executing trades for their account(s) and otherwise adversely affect management of their account(s).

By directing Metanoia to use a specific broker or dealer, clients who are subject to ERISA confirm and agree with Metanoia that they have the authority to make the direction, that there are no provisions in any client or plan document which are inconsistent with the direction, that the brokerage and other goods and services provided by the broker or dealer through the brokerage transactions are provided solely to and for the benefit of the client's plan, plan participants and their beneficiaries, that the amount paid for the brokerage and other services have been determined by the client and the plan to be reasonable, that any expenses paid by the broker on behalf of the plan are expenses that the plan would otherwise be obligated to pay, and that the specific broker or dealer is not a party in interest of the client or the plan as defined under applicable ERISA regulations.

#### Aggregated Trade Policy

Metanoia typically directs trading in individual client accounts as and when trades are appropriate based on the client's Investment Plan, without regard to activity in other client accounts. However, from time to time, Metanoia may aggregate trades together for multiple client accounts, most often when these accounts are being directed to sell the same securities. If such an aggregated trade is not completely filled, Metanoia will allocate shares received (in an aggregated purchase) or sold (in an aggregated sale) across participating accounts on a pro rata or other fair basis; provided, however, that any participating accounts that are owned by Metanoia or its officers, directors, or employees will be excluded first.

#### ***Item 13 - Review of Accounts***

Managed portfolios are reviewed at least quarterly, but may be reviewed more often if requested by the client, upon receipt of information material to the management of the portfolio, or at any time such review is deemed necessary or advisable by Metanoia. These factors generally include but are not limited to, the following: change in general client circumstances (marriage, divorce, retirement); or economic, political or market conditions. Robert J. Cremins, III, Metanoia's Managing Member, reviews all accounts.

Account custodians are responsible for providing monthly or quarterly account statements which reflect the positions (and current pricing) in each account as well as transactions in each account, including fees paid from an account. Account custodians also provide prompt confirmation of all trading activity, and year-end tax statements, such as 1099 forms. Metanoia will provide additional written reports as needed or requested by the client.

#### ***Item 14 - Client Referrals and Other Compensation***

As noted above, Metanoia receives an economic benefit from TD Ameritrade in the form of support products and services it makes available to Metanoia and other independent investment advisors that have their clients maintain accounts at TD Ameritrade. These products and services, how they benefit our firm, and the related conflicts of interest are described in ***Item 12 - Brokerage Practices***. The availability of TD Ameritrade's products and services to Metanoia is based solely on our participation in the programs and not in the provision of any particular investment advice. Neither TD Ameritrade nor any other party is paid to refer clients to Metanoia.

#### ***Item 15 - Custody***

TD Ameritrade is the custodian of nearly all client accounts at Metanoia. From time to time however, clients may select an alternate broker to hold accounts in custody. In any case, it is the custodian's responsibility to provide clients with confirmations of trading activity, tax forms and at least quarterly account statements. Clients are advised to review this information carefully, and to notify Metanoia of any questions or concerns. Clients are also asked to promptly notify Metanoia if the custodian fails to provide statements on each account held.

From time to time and in accordance with Metanoia's agreement with clients, Metanoia will provide additional reports. The account balances reflected on these reports should be compared to the balances shown on the brokerage statements to ensure accuracy. At times there may be small differences due to the timing of dividend reporting and pending trades.

#### ***Item 16 - Investment Discretion***

As described above under ***Item 4 - Advisory Business***, Metanoia manages portfolios on a discretionary basis. This means that after an Investment Plan is developed for the client's investment portfolio, Metanoia will execute that plan without specific consent from the client for each transaction. For discretionary accounts, a Limited Power of Attorney ("LPOA") is executed by the client, giving Metanoia the authority to carry out various activities in the account, generally including the following: trade execution; the ability to request checks on behalf of the client, and the withdrawal of advisory fees directly from the account. Metanoia then directs investment of the client's portfolio using its discretionary authority. The client may limit the terms of the LPOA to the extent consistent with the client's investment advisory agreement with Metanoia and the requirements of the client's custodian. The discretionary relationship is further described in the agreement between Metanoia and the client.

#### ***Item 17 - Voting Client Securities***

As a policy and in accordance with Metanoia's client agreement, Metanoia does not vote proxies related to securities held in client accounts. The custodian of the account will normally provide proxy materials directly to the client. Clients may contact Metanoia with questions relating to

proxy procedures and proposals; however, Metanoia generally does not research particular proxy proposals.

***Item 18 - Financial Information***

Metanoia does not require nor solicit prepayment of more than \$500 in fees per client, six months or more in advance. Metanoia has no financial condition that will impair its ability to meet clients' contractual commitments, and therefore has no disclosure required for this item.

***Item 19 - Requirements for State-Registered Advisers***

As the principal executive officer and management person of Metanoia, Bobby Cremins' background information is provided elsewhere in this Form ADV. Other than this, no disclosure is required under this item.

Set forth below is the Summary of Material Changes for Metanoia Financial, LLC:

<b>Date of Change</b>	<b>Description of Item</b>
January 2016	Metanoia Financial, LLC has moved to a new location. The change is reflected on the Cover Page of this document.

# **Exhibit A**

**Brochure Supplement**

**Form ADV Part 2B**

**Item 1 - Cover Page**

**Robert J. Cremins, III, CFP®, CFA**

**CRD# 4685581**

**of**

**Metanoia Financial, LLC**

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Philadelphia, Pennsylvania 19146

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**March 7, 2016**

This brochure supplement provides information about Robert (“Bobby”) Cremins, and supplements the Metanoia Financial, LLC (“Metanoia”) brochure. You should have received a copy of that brochure. Please contact us at (404) 585-1011 if you did not receive Metanoia’s brochure, or if you have any questions about the contents of this supplement.

Additional information about Bobby is available on the SEC’s website at [www.AdviserInfo.sec.gov](http://www.AdviserInfo.sec.gov).

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***Item 2 - Educational Background and Business Experience***

Robert J. Cremins, III (year of birth 1976) is Managing Member of Metanoia. After beginning his financial career with SunTrust Bank, Bobby spent seven years with Smith Barney and Bank of America/Merrill Lynch focused on wealth management. He primarily advised high net worth clients and business owners and helped them design sophisticated strategies to protect, grow and distribute their wealth. From his experiences working at top Wall Street firms, Bobby developed a different approach to managing personal finances. His approach results in a highly personalized financial blueprint to help his clients achieve their goals and reach financial peace.

Bobby completed the Financial Planner Program at Oglethorpe University and became a CERTIFIED FINANCIAL PLANNER™ professional\* while working at Smith Barney. He received the Chartered Financial Analyst® (CFA®)\*\* designation in 2013.

\* The CFP® certification is granted by Certified Financial Planner Board of Standards, Inc. (CFP Board). To attain the certification, the candidate must complete the required educational, examination, experience and ethics requirements set forth by CFP Board. Certain designations, such as the CPA, CFA and others may satisfy the education component, and allow a candidate to sit for the CFP® Certification Examination. A comprehensive examination tests the candidate's ability to apply financial planning knowledge to client situations. Qualifying work experience is also required for certification. Qualifying experience includes work in the area of the delivery of the personal financial planning process to clients, the direct support or supervision of others in the personal financial planning process, or teaching all, or any portion, of the personal financial planning process. CFP® professionals must complete 30 hours of continuing education accepted by CFP Board every two years.

\*\*The Chartered Financial Analyst® ("CFA®") designation is a professional designation given by the CFA Institute that measures the competence and integrity of financial analysts. The CFA Program is a graduate-level self-study program that combines a broad-based curriculum of investment principles with professional conduct requirements. Candidates are required to pass three levels of examinations covering areas such as accounting, economics, ethics, money management and security analysis. Before a candidate is eligible to become a CFA charterholder, he/she must meet minimum experience requirements in the area of investment/financial practice. To enroll in the program, a candidate must hold a bachelor's degree.

### ***Item 3 - Disciplinary Information***

Advisers are required to disclose any material facts regarding certain legal or disciplinary events that would be material to your evaluation of an adviser; however, Bobby has no such disciplinary information to report.

### ***Item 4 - Other Business Activities***

Bobby Cremins is not engaged in any other business activities.

### ***Item 5 - Additional Compensation***

Other than stated above, Bobby has no other income or compensation to disclose.

### ***Item 6 - Supervision***

As the sole owner of Metanoia, Bobby supervises all duties and activities of the firm, and is responsible for all advice provided to clients. He can be reached at (404) 585-1011.

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

In addition to Item 3 above, state-registered advisers are required to disclose all material facts regarding any event in which a supervised person of the firm was found liable in certain legal proceedings, or was the subject of a bankruptcy petition. Bobby has no event to disclose with respect to this item.