

**Firm Brochure**  
(Part 2 A & B of Form ADV)

**Financial Settlement Solutions, LLC**  
**1001 4<sup>th</sup> Ave, STE 3200**  
**Seattle, WA 98154**  
**206 953-1231**  
**www.FinancialSettlementSolutions.com**  
**JTwitchell@FinancialSettlementSolutions.com**

This brochure provides information about the qualifications and business practices of FINANCIAL SETTLEMENT SOLUTIONS, LLC. If you have any questions about the contents of this brochure, please contact us at: 206 953-1231,

or by email at: JTwitchell@FinancialSettlementSolutions.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority.

Additional information about FINANCIAL SETTLEMENT SOLUTIONS, LLC is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

**Central Registration Depository ("CRD") number 135339.**

October 30, 2019

Financial Settlement Solutions, LLC

**Material Changes**

---

**Annual Update**

The Material Changes section of this brochure will be updated annually when material changes occur since the previous release of the Firm Brochure.

---

**Material Changes since the Last Update**

NONE.

---

**Full Brochure Available**

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: 206 953-1231 or by email at JTwitchell@FinancialSettlementSolutions.com.

## Table of Contents

<b>Material Changes</b> .....	<b>i</b>
Annual Update .....	i
Material Changes since the Last Update .....	i
Full Brochure Available .....	i
<b>Advisory Business</b> .....	<b>1</b>
Firm Description .....	1
Principal Owners.....	1
Types of Advisory Services.....	1
Tailored Relationships .....	2
Types of Agreements.....	2
Financial Planning Agreement .....	2
Advisory Service Agreement.....	2
Retainer Agreement.....	2
Hourly Planning Engagements .....	3
Asset Management .....	3
Termination of Agreement .....	3
<b>Fees and Compensation</b> .....	<b>3</b>
Description .....	3
Fee Billing .....	3
Other Fees.....	3
Past Due Accounts and Termination of Agreement .....	4
<b>Performance-Based Fees</b> .....	<b>4</b>
Sharing of Capital Gains .....	4
<b>Types of Clients</b> .....	<b>4</b>
Description .....	4
<b>Methods of Analysis, Investment Strategies and Risk of Loss</b> .....	<b>4</b>
Methods of Analysis.....	4
Risk of Loss .....	4
<b>Disciplinary Information</b> .....	<b>5</b>
Legal and Disciplinary.....	5

TOC 1

Financial Settlement Solutions, LLC

<b>Other Financial Industry Activities and Affiliations</b> .....	<b>5</b>
Financial Industry Activities.....	5
Affiliations .....	5
<b>Code of Ethics, Participation or Interest in Client Transactions and Personal Trading</b> .....	<b>6</b>
Code of Ethics .....	6
Participation or Interest in Client Transactions.....	6
Personal Trading.....	6
<b>Brokerage Practices</b> .....	<b>6</b>
Selecting Brokerage Firms.....	6
Soft Dollars .....	6
<b>Review of Accounts</b> .....	<b>7</b>
Periodic Reviews .....	7
Review Triggers .....	7
Regular Reports.....	7
<b>Client Referrals and Other Compensation</b> .....	<b>7</b>
Incoming Referrals.....	7
Referrals Out .....	7
<b>Custody</b> .....	<b>7</b>
Account Statements.....	7
Performance Reports .....	7
Net Worth Statements.....	7
<b>Investment Discretion</b> .....	<b>8</b>
Discretionary Authority for Trading.....	8
Limited Power of Attorney.....	8
<b>Voting Client Securities</b> .....	<b>8</b>
Proxy Votes .....	8
<b>Financial Information</b> .....	<b>8</b>
Financial Condition .....	8
<b>Business Continuity Plan</b> .....	<b>9</b>
General .....	9
Disasters .....	9

TOC 2

Financial Settlement Solutions, LLC

Alternate Offices .....	9
<b>Information Security Program.....</b>	<b>9</b>
Information Security .....	9
Privacy Notice.....	9
<b>Brochure Supplement (Part 2B of Form ADV) .....</b>	<b>10</b>
Education and Business Standards .....	10
Professional Certifications .....	10
John Twitchell, CERTIFICATIONS .....	10

## Advisory Business

---

### Firm Description

FINANCIAL SETTLEMENT SOLUTIONS, LLC was founded in 2004.

FINANCIAL SETTLEMENT SOLUTIONS, LLC provides personalized confidential financial and divorce planning to individuals. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, tax analysis, insurance data, investment education, education funding, retirement planning, and divorce planning.

FINANCIAL SETTLEMENT SOLUTIONS, LLC is strictly a fee-only financial planning and analysis firm. The firm does not sell annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products. The firm is not affiliated with entities that sell financial products or securities. No commissions in any form are accepted. No finder's fees are accepted.

Investment education is provided, with the client making the final decision on investment selection and divorce settlement. FINANCIAL SETTLEMENT SOLUTIONS, LLC does not act as a custodian of client assets. The client always maintains asset control. FINANCIAL SETTLEMENT SOLUTIONS, LLC does not place trades for clients.

A written evaluation of each client's initial situation is provided to the client, often in the form of a net worth statement and budgets with tax analysis. Periodic reviews are also communicated to provide reminders of the specific courses of action that need to be taken. More frequent reviews occur but are not necessarily communicated to the client unless immediate changes are recommended.

Other professionals (e.g., lawyers, divorce coaches, accountants, insurance agents, etc.) are engaged directly by the client on an as-needed basis. Conflicts of interest will be disclosed to the client in the unlikely event they should occur.

The initial meeting, which may be by telephoning 206 953-1231, is not free of charge and is considered an exploratory interview to determine the extent to which financial or divorce planning or analysis may be beneficial to the client.

---

### Principal Owners

John Twitchell is a 100% owner and is the managing member.

---

### Types of Advisory Services

FINANCIAL SETTLEMENT SOLUTIONS, LLC does not provide investment supervisory services, also known as asset management services; does not manage investment advisory accounts; nor does it furnish investment advice through consultations; does not issue periodicals about securities by subscription; does not issue special reports about securities; and does not issue, charts, graphs, formulas, or other devices which clients may use to evaluate securities.

On more than an occasional basis, FINANCIAL SETTLEMENT SOLUTIONS, LLC furnishes advice to clients on matters not involving securities, such as financial planning matters, taxation analysis, and divorce planning.

FINANCIAL SETTLEMENT SOLUTIONS, LLC does not provide a timing service.

As of December 7, 2004, FINANCIAL SETTLEMENT SOLUTIONS, LLC does not manage any assets for clients.

---

**Tailored Relationships**

The goals and objectives for each client are documented in our client relationship management system.

Agreements may not be assigned without client consent.

---

**Types of Agreements**

The following agreements define the typical client relationships.

---

**Financial Planning or Analysis Agreement “Neutral Financial Collaborative Participation Agreement” or “Neutral Financial Cooperative Participation Agreement”**

A financial plan or analysis is designed to help the client with all aspects of financial planning or divorce planning without ongoing investment management after the financial plan or divorce analysis is completed.

The financial/divorce plan or analysis may include, but is not limited to: a net worth statement; a cash flow statement and tax analysis; a review of retirement accounts and plans; a review of insurance policies, if necessary; one or more retirement scenarios or divorce scenarios; and education planning with funding recommendations.

Detailed investment advice and specific recommendations are not provided as part of a financial/divorce plan. Implementation of the recommendations is at the discretion of the client.

The fee for a financial/divorce plan or analysis is not predicated upon the facts known at the start of the engagement. Since financial/divorce planning or analysis is a discovery process, situations occur wherein the client is unaware of certain financial exposures or predicaments.

All work is billed separately at the rate of \$300 per hour.

---

**Advance on Fee Agreement**

In some circumstances, an *Advance on Fee Agreement* may be executed. All work is billed on an hourly basis against the advance on fee first and then is billed to the client on a monthly invoice and billing statement. If an advance on fee is requested it will be deposited into FINANCIAL SETTLEMENT SOLUTIONS, LLC’s account to be applied to fees when due. There is a high probability that the total fee will exceed the advance on fee paid by the client.

---

**Hourly Planning or Analysis Engagements**

FINANCIAL SETTLEMENT SOLUTIONS, LLC provides hourly planning or analysis services for clients who need advice on a limited scope of work. The hourly rate for limited scope engagements is \$300.

---

**Asset Management**

FINANCIAL SETTLEMENT SOLUTIONS, LLC does not manage any client assets nor does it receive any compensation, in any form, from fund companies.

Initial public offerings (IPOs) are not available through FINANCIAL SETTLEMENT SOLUTIONS, LLC.

---

**Termination of Agreement**

A Client may terminate any of the aforementioned agreements at any time by notifying FINANCIAL SETTLEMENT SOLUTIONS, LLC in writing and paying the rate for the time spent on the financial planning or analysis engagement prior to notification of termination. If the client made an advance payment, FINANCIAL SETTLEMENT SOLUTIONS, LLC will refund any unearned portion of the advance payment.

FINANCIAL SETTLEMENT SOLUTIONS, LLC may terminate any of the aforementioned agreements at any time by notifying the client in writing. If the client made an advance payment, FINANCIAL SETTLEMENT SOLUTIONS, LLC will refund any unearned portion of the advance payment.

---

**Fees and Compensation**

---

**Description**

FINANCIAL SETTLEMENT SOLUTIONS, LLC bases its fees on hourly charges.

Per WAC 460-24A-105 FINANCIAL SETTLEMENT SOLUTIONS, LLC may not maintain an advance on fee of \$500 or more for 6 months or longer without having custody of the funds.

---

**Fee Billing**

FINANCIAL SETTLEMENT SOLUTIONS, LLC may receive an “Advance on Fee” to be deposited into FINANCIAL SETTLEMENT SOLUTIONS, LLC’s account to be applied to fees when due. There is a high probability that the total fee will exceed the advance on fee. Under no circumstances will any “advance on fees” be held for 6 months or longer. If necessary, the advance will be returned if there is a delay in completing the work during that time period. At the termination of this contract by withdrawal or completion, any unbilled portion of any advance will be immediately refunded. Per WAC 460-24A-105 FINANCIAL SETTLEMENT SOLUTIONS, LLC may not maintain an advance on fee of \$500 or more for 6 months or longer without having custody of the funds.

---

**Other Fees**

There are no other fees charged.

---

**Past Due Accounts and Termination of Agreement**

FINANCIAL SETTLEMENT SOLUTIONS, LLC reserves the right to stop work on any account that is more than 30 days overdue. In addition, FINANCIAL SETTLEMENT SOLUTIONS, LLC reserves the right to terminate any financial/divorce planning or analysis engagement where a client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate, in FINANCIAL SETTLEMENT SOLUTIONS, LLC's judgment, to providing proper financial advice or analysis. Any unused portion of fees collected in advance will be refunded within 10 days.

---

**Performance-Based Fees**

---

**Sharing of Capital Gains**

Fees are not based on a share of the capital gains or capital appreciation of assets.

FINANCIAL SETTLEMENT SOLUTIONS, LLC does not use a performance-based fee structure because of the potential conflict of interest

---

**Types of Clients**

---

**Description**

FINANCIAL SETTLEMENT SOLUTIONS, LLC generally provides financial/divorce planning advice or analysis to individuals.

Client relationships vary in scope and length of service.

---

**Methods of Analysis, Investment Strategies and Risk of Loss**

---

**Methods of Analysis**

Economic or divorce analysis methods may include charting, fundamental analysis, technical analysis, and cyclical analysis.

The main sources of information include financial newspapers and magazines, inspections of corporate activities, research materials prepared by others, corporate rating services, timing services, annual reports, prospectuses, filings with the Securities and Exchange Commission, and company press releases.

Other sources of information that FINANCIAL SETTLEMENT SOLUTIONS, LLC may use include the World Wide Web.

---

**Risk of Loss**

All investment programs have certain risks that are borne by the investor. Investors face the following investment risks:

- Interest-rate Risk: Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.

- Market Risk: The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- Inflation Risk: When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- Currency Risk: Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- Reinvestment Risk: This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- Business Risk: These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- Liquidity Risk: Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- Financial Risk: Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

---

**Disciplinary Information**

---

**Legal and Disciplinary**

The firm and its employees have not been involved in legal or disciplinary events related to past or present investment clients.

---

**Other Financial Industry Activities and Affiliations**

---

**Financial Industry Activities**

FINANCIAL SETTLEMENT SOLUTIONS, LLC is a Registered Investment Advisor.

---

**Affiliations**

FINANCIAL SETTLEMENT SOLUTIONS, LLC has no affiliations.

## Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

---

### Code of Ethics

The employees of FINANCIAL SETTLEMENT SOLUTIONS, LLC have committed to a Code of Ethics that is available for review by clients and prospective clients upon request. The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

### Participation or Interest in Client Transactions

FINANCIAL SETTLEMENT SOLUTIONS, LLC and its employees may buy or sell securities that are also held by clients. Employees may not trade their own securities ahead of client trades. Employees comply with the provisions of the FINANCIAL SETTLEMENT SOLUTIONS, LLC *Investment Advisor Compliance and Supervisory Procedures Manual*.

### Personal Trading

The Chief Compliance Officer of FINANCIAL SETTLEMENT SOLUTIONS, LLC is John Twitchell. He reviews all employee trades each quarter. The personal trading reviews ensure that the personal trading of employees does not affect the markets, and that clients of the firm receive preferential treatment. Since most employee trades are small mutual fund trades or exchange-traded fund trades, the trades do not affect the securities markets.

## Brokerage Practices

---

### Selecting Brokerage Firms

FINANCIAL SETTLEMENT SOLUTIONS, LLC does not have any affiliation with product sales firms. Specific custodian recommendations are made to Clients based on their need for such services. FINANCIAL SETTLEMENT SOLUTIONS, LLC recommends custodians based on the proven integrity and financial responsibility of the firm and the best execution of orders at reasonable commission rates.

FINANCIAL SETTLEMENT SOLUTIONS, LLC *DOES NOT* receive fees or commissions from any of these arrangements.

### Soft Dollars

FINANCIAL SETTLEMENT SOLUTIONS, LLC does not receive any soft or hard dollars as compensation from custodians.

## Review of Accounts

---

### Periodic Reviews

Account reviews are performed quarterly by John Twitchell, Managing Member. Account reviews are performed more frequently when market conditions or scheduled meetings dictate.

### Review Triggers

Other conditions that may trigger a review are changes in the tax laws, new investment information, and changes in a client's own situation or at the request of a client's attorney.

### Regular Reports

Clients receive periodic communications on at least an annual basis. The written updates may include a net worth statement, budget and tax analysis.

## Client Referrals and Other Compensation

---

### Incoming Referrals

FINANCIAL SETTLEMENT SOLUTIONS, LLC has been fortunate to receive many client referrals over the years. The referrals came from current clients, Family Law attorneys, accountants and other similar sources. The firm does not compensate referring parties for these referrals.

### Referrals Out

FINANCIAL SETTLEMENT SOLUTIONS, LLC does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

## Custody

---

### Account Statements

FINANCIAL SETTLEMENT SOLUTIONS, LLC does not hold any of the client's assets nor does it provide account statements.

### Performance Reports

FINANCIAL SETTLEMENT SOLUTIONS, LLC does not provide any performance reports.

### Net Worth Statements

Clients are frequently provided net worth statements and net worth graphs that are generated from our client provided information. Net worth statements contain approximations of bank account balances provided by the client, as well as the value of land and hard-to-price real estate. The net worth statements are used for long-term

financial/divorce planning or analysis where the exact values of assets are not material to the financial/divorce planning tasks.

## Investment Discretion

### Discretionary Authority for Trading

FINANCIAL SETTLEMENT SOLUTIONS, LLC does not accept discretionary authority to manage securities accounts on behalf of clients. FINANCIAL SETTLEMENT SOLUTIONS, LLC does not have the authority to determine the securities to be bought or sold, and the amount of the securities to be bought or sold.

The client approves the custodian to be used and the commission rates paid to the custodian. FINANCIAL SETTLEMENT SOLUTIONS, LLC does not receive any portion of the transaction fees or commissions paid by the client to the custodian on certain trades.

FINANCIAL SETTLEMENT SOLUTIONS, LLC does not do any type of discretionary trading.

### Limited Power of Attorney

A limited power of attorney is a trading authorization for this purpose. FINANCIAL SETTLEMENT SOLUTIONS, LLC does not have a Limited Power of Attorney.

## Voting Client Securities

### Proxy Votes

FINANCIAL SETTLEMENT SOLUTIONS, LLC does not vote proxies on securities. Clients are expected to vote their own proxies.

## Financial Information

### Financial Condition

FINANCIAL SETTLEMENT SOLUTIONS, LLC does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients.

A balance sheet is not required to be provided because FINANCIAL SETTLEMENT SOLUTIONS, LLC does not serve as a custodian for client funds or securities, and does not require prepayment of fees of more than \$500 per client, and six months or more in advance.

## Business Continuity Plan

### General

FINANCIAL SETTLEMENT SOLUTIONS, LLC has a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications, services or key people.

### Disasters

The Business Continuity Plan covers natural disasters such as snow storms, hurricanes, tornados, and flooding. The Plan covers man-made disasters such as loss of electrical power, loss of water pressure, fire, bomb threat, nuclear emergency, chemical event, biological event, Internet outage, railway accident and aircraft accident. Electronic files are backed up weekly and archived offsite.

### Alternate Offices

Alternate offices are identified to support ongoing operations in the event the main office is unavailable. It is our intention to contact all clients within five days of a disaster that dictates moving our office to an alternate location.

### Business Continuity Plan Available

Business Continuity Plan is available upon request.

## Information Security Program

### Information Security

FINANCIAL SETTLEMENT SOLUTIONS, LLC maintains an information security program to reduce the risk that your personal and confidential information may be breached.

### Privacy Notice

FINANCIAL SETTLEMENT SOLUTIONS, LLC is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us.

The categories of nonpublic information that we collect from you may include information about your personal finances, information about your health to the extent that it is needed for the financial planning process, information about transactions between you and third parties, and information from consumer reporting agencies, e.g., credit reports. We use this information to help you meet your personal financial goals.

With your permission, we disclose limited information to attorneys, accountants, and mortgage lenders with whom you have established a relationship. You may opt out from our sharing information with these nonaffiliated third parties by notifying us at any time by telephone at 206 953-1231, mail, fax, email, or in person.

We maintain a secure office to ensure that your information is not placed at unreasonable risk. We employ a firewall barrier, secure data encryption techniques and authentication procedures in our computer environment.

We do not provide your personal information to mailing list vendors or solicitors. We require strict confidentiality in our agreements with unaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors. Federal and state securities regulators may review our Company records and your personal records as permitted by law.

Personally identifiable information about you will be maintained while you are a client, and for the required period thereafter that records are required to be maintained by federal and state securities laws. After that time, information may be destroyed.

We will notify you in advance if our privacy policy is expected to change. We are required by law to deliver this *Privacy Notice* to you annually, in writing.

## Brochure Supplement (Part 2B of Form ADV)

---

### Education and Business Standards

FINANCIAL SETTLEMENT SOLUTIONS, LLC requires that advisors in its employ have a bachelor's degree and further coursework demonstrating knowledge of financial/divorce planning/analysis and tax analysis. Examples of acceptable coursework include: a CDFAs. Additionally, advisors must have work experience that demonstrates their aptitude for financial/divorce planning.

---

### Professional Certifications

Employees have earned certifications and credentials that are required to be explained in further detail.

---

### John Twitchell, CERTIFICATIONS

Educational Background:

- Date of birth: 1949
- University of California, Santa Barbara: Bachelors of Arts in Economics 1974
- University of California, Santa Barbara: Masters degree in Economics 1975
- University of Washington School of Law: Professional Mediation Skills Training 2005
- Institute for Divorce Financial Analysts: CDFAs Certified Divorce Financial Analyst 2005
- Harvard Law School Negotiation Insight Initiative: Advanced Mediation Skills Program 2007
- Harvard Law School Program on Negotiation: Advanced Negotiation, Difficult Conversations 2008 & 2010
- Seattle Collaborative Law Training Group: Various Collaborative Law trainings 2005 - 2012

### Business Experience:

- Economist, CDFAs, Financial Settlement Solutions, LLC 2004-present
- Economist, CDFAs, Miller Advisor, Inc. 1997-2005
- Settlement Consultant, JMW Settlements Inc. 1989-1997
- Business Owner, Saltwater Cafe, Inc. 1982-1994
- Financial Advisor, Merrill Lynch 1976-1982

Disciplinary Information: None

Other Business Activities: None

Additional Compensation: None

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None