

Item 1 Cover Page



Step By Step Financial, LLC

**9717 E. 42nd St., Suite 103
Tulsa, OK 74146**

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www.stepbystepfinancial.com

June 4, 2025

Form ADV Part 2A Brochure

This brochure furnishes comprehensive details about Step By Step Financial, LLC ("SBS") 's qualifications and business practices. If you have any inquiries regarding the contents of this brochure, please do not hesitate to contact us at 918-806-1030 or [kjacobson@stepbystepfinancial.com](mailto:kjacobs@stepbystepfinancial.com). It is important to note that the information presented in this brochure has not been endorsed or validated by the United States Securities and Exchange Commission or any state securities authority.

Additional information about Step By Step Financial, LLC. can be accessed on the SEC's website at www.adviserinfo.sec.gov. The company's CRD number is 146345.

Step By Step Financial, LLC. is a registered investment adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a specific level of competence or training.

Item 2 Summary of Material Changes

The Form ADV Part 2 mandates that registered investment advisers update their brochures if the information is materially inaccurate. If an adviser's disclosure brochure has any material changes, they must inform you and describe these changes.

After the last update of this brochure on January 7, 2025, the following material changes have been made:

- We (Step By Step Financial, LLC) are no longer offering tax preparation as part of our annual agreement for Wealth Building and Wealth Management clients. Tax preparation services will now be provided through an affiliated but separate entity, Step By Step Tax Solutions, LLC.

Future Changes:

We retain the right to periodically revise this Disclosure Brochure to align with any modifications in our business practices, changes in regulations, and routine annual updates mandated by securities regulators. In the event of a significant alteration in Step By Step Financial, LLC's business practices, the complete Disclosure Brochure or a Summary of Material Changes will be furnished to each Client annually.

The current Disclosure Brochure can be accessed online at the SEC's Investment Adviser Public Disclosure website, <http://www.adviserinfo.sec.gov>, by searching for our firm name or CRD number 146345.

Additionally, you can request a copy of this Disclosure Brochure at any time by contacting us at 918-806-1030.

Item 3 Table of Contents

Item 1: Cover Page	1
Item 2: Summary of Material Changes	2
Item 3: Table of Contents	3
Item 4: Advisory Business	4
Item 5: Fees and Compensation	6
Item 6: Performance-Based Fees and Side-By-Side Management	10
Item 7: Types of Clients	10
Item 8: Methods of Analysis, Investment Strategies, and Risk of Loss	11
Item 9: Disciplinary Information	12
Item 10: Other Financial Industry Activities and Affiliations	13
Item 11: Code of Ethics, Participation or Interest in Client Transactions, and Personal Trading	13
Item 12: Brokerage Practices	14
Item 13: Review of Accounts	15
Item 14: Client Referrals and Other Compensation	15
Item 15: Custody	16
Item 16: Investment Discretion	17
Item 17: Voting Client Securities	17
Item 18: Financial Information	17
Item 19: Requirements for State-Registered Advisers	18
ADV Part 2B	19

Item 4: Advisory Business

About Our Firm

Step By Step Financial, LLC is a registered investment adviser in Tulsa, OK, started by Kevin F. Jacobs, CFP®, on March 28, 2008. We help busy families and retirees manage their finances.

Services We Offer

You engage the Advisor to provide ongoing financial planning, and investment advisory services. The Advisor will:

- Develop, implement, and monitor your financial plan.
- Offer investment advisory services.

Financial Planning Services

Financial planning services help you understand your current financial situation and plan for the future. The Advisor will:

1. **Understand Your Situation:** Gather and analyze your personal and financial information.
2. **Set Goals:** Identify and prioritize your financial goals.
3. **Evaluate Your Current Path:** Assess your current financial actions and suggest changes.
4. **Create Recommendations:** Develop personalized financial advice.
5. **Present the Plan:** Explain the recommendations and their benefits.
6. **Implement the Plan:** Assist you in putting the recommendations into action.
7. **Monitor and Update:** Review your progress and adjust as needed.

Investment Advisory Services

Our investment advisory services manage your investment portfolio to help you reach your financial goals. We use a passive investment management approach, focusing on low-cost, tax-efficient index mutual funds or ETFs to build diversified portfolios that aim to match market returns.

Collaborative Arrangement with Asset Dedication, LLC

We collaborate with Asset Dedication, LLC, an independent adviser. We may recommend Asset Dedication's investment strategies and services to clients based on their needs through this arrangement.

Role of Asset Dedication

1. **Investment Strategies:** We will describe the investment programs and strategies available from Asset Dedication that may be most beneficial and appropriate for you, aligning with your stated investment objectives and risk tolerance.
2. **Agreement:** Wealth Management clients will enter into an agreement directly with Asset Dedication, who will provide investment management services.
3. **Communication:** We will serve as the communication conduit between you and Asset Dedication, remaining available to answer any questions regarding your account.
4. **Client Onboarding and Support:** Before introducing you to Asset Dedication, we will collect financial and demographic information to help identify your financial objectives. We will also keep your financial plan current to meet your ongoing needs. If you do not update your financial plan timely, we may need to resign from the agreement.
5. **Discretionary Authority:** Asset Dedication will generally have discretionary authority to determine the securities to be purchased and sold for your accounts managed by them. They also provide operational support to us for efficient investment management delivery and reporting.
6. **Considerations and Disclosures:** Clients are advised that other third-party managed programs may also be suitable and could be more or less costly. No guarantees can be made that your financial goals or objectives will be achieved, and no performance guarantees can be offered. Investments involve risk, including the possible loss of principal.

You should obtain and read Asset Dedication's Disclosure Brochure (ADV Part 2) for a complete description of their services, fee schedules, and account minimums. A Disclosure Brochure will be provided to you when an agreement for services is executed, and an account is established.

Assets Under Management

We currently report \$41,886,573 discretionary Assets Under Management, and \$5,763,837 non-discretionary Assets Under Management. Assets Under Management were calculated as of December 31, 2024.

Item 5: Fees and Compensation

Wealth Building Fee Structure

The annual fee is calculated by adding your Adjusted Gross Income (AGI) fee and Net Worth fee, as described below. This structure is designed for clients with investable managed assets under \$1,000,000.

Fee Breakdown

AGI Fees: 1.00% of AGI

- Adjusted Gross Income (AGI) is your total gross income minus specific deductions on your most recent tax return (line 11).

Net Worth Fees: 0.50% of Net Worth

- Net Worth is the total value of your assets minus your liabilities, excluding the value of any closely held businesses. Assets include cash, investments, real estate, and personal property. Liabilities include mortgages, loans, and other debts. The Net Worth calculation will be determined by the Advisor and mutually agreed upon by the Client to calculate the wealth-building fee.

Annual Minimum Total Fee: \$3,000

Payment Terms

- Down Payment: \$1,000
- Remaining Balance: Billed monthly or quarterly in arrears
- Payment Methods: ACH bank draft or direct from Client's accounts held at Altruist

Adjustments

- Fees are reviewed annually

Agreement Terms

- 12 months

Investment Management

- The Advisor may or may not manage Client accounts under the wealth-building fee structure. There are no additional fees for asset management on the wealth-building platform.

Trading Authorization: Wealth-building services are offered on a non-discretionary basis.

Examples of Wealth Building Plan Fee Calculation

1. Example 1:

- AGI: \$50,000
- Net Worth: 50,000
- AGI Fee: \$50,000 at 1.00% = \$500
- Net Worth Fee: \$50,000 at 0.50% = \$250
- Total Annual Fee: \$750 (\$3,000 minimum annual fee applied)

2. Example 2:

- AGI: \$75,000
- Net Worth: \$500,000
- AGI Fee: \$75,000 at 1.00% = \$750
- Net Worth Fee: \$500,000 at 0.50% = \$2,500
- Total Annual Fee: \$750 + \$2,500 = \$3,250

3. Example 3:

- AGI: \$200,000
- Net Worth: \$2,000,000
- AGI Fee: \$200,000 at 1.00% = \$2,000
- Net Worth Fee: \$2,000,000 at 0.50% = \$10,000
- Total Annual Fee: \$2,000 + \$10,000 = \$12,000

4. Example 4:

- AGI: \$300,000
- Net Worth: \$1,500,000
- AGI Fee: \$300,000 at 1.00% = \$3,000
- Net Worth Fee: \$1,500,000 at 0.50% = \$7,500
- Total Annual Fee: \$3,000 + \$7,500 = \$10,500

Wealth Management Fee Structure

Our investment management fee is based on the total investments we manage multiplied by the annual fee percentage. This service model is designed for clients with over \$1,000,000 in investable managed assets. Fees are charged quarterly based on the value of managed accounts at the end of each calendar quarter.

Fee Breakdown

Assets Under Management Annual Fee:

- \$250,000 - \$1,000,000: 1.25%
- \$1,000,001 - \$3,000,000: 1.00%
- \$3,000,001 - \$4,000,000: 0.80%
- \$4,000,001 - \$5,000,000: 0.75%
- \$5,000,001 and over: 0.70%

Cliff Fee Structure

- The entire balance is charged at the applicable rate.

Payment Terms

- Billing: Quarterly in advance on March 31st, June 30th, September 30th, and December 31st
- Fee Deduction: Fees are deducted directly from the Client's accounts held in custody at Fidelity.

Fee Variation

The specific rate may vary from quarter to quarter depending on market performance and the proximity to the following fee bracket under the wealth management model.

Transfer of Assets

All managed assets will be transferred to Fidelity within the first 90 days of signing this agreement. Accounts that cannot be immediately transferred will be transferred as they become available.

Trading Authorization

Wealth management services are offered on a discretionary basis.

Examples of Wealth Management Plan Fee Calculation

1. Example 1:

- Assets Under Management: \$1,875,000
- Annual Fee: \$1,875,000 at 1.00% = \$18,750
- Quarterly Fee: \$18,750 / 4 = \$4,687.50

2. Example 2:

- Assets Under Management: \$2,625,000
- Annual Fee: \$2,625,000 at 1.00% = \$26,250
- Quarterly Fee: \$26,250 / 4 = \$6,562.50

3. Example 3:

- Assets Under Management: \$3,375,000
- Annual Fee: \$3,375,000 at 0.80% = \$27,000
- Quarterly Fee: \$27,000 / 4 = \$6,750

4. Example 4:

- Assets Under Management: \$4,125,000
- Annual Fee: \$4,125,000 at 0.75% = \$30,937.50
- Quarterly Fee: \$30,937.50 / 4 = \$7,734.38

Sub-Adviser Fees

The Outside Manager (Sub-Adviser) will debit the client's account for the Outside Manager's fee and Step By Step Financial, LLC's advisory fee. The above fee schedule includes the Outside Manager's fee. No increase in the annual fee shall be effective without the client's agreement by signing a new agreement or amendment to their current advisory agreement.

Reconciliation

Please reconcile our invoices with the statements you receive from the qualified custodian. If you find any inconsistent information between our invoice and the statement(s) you receive from the qualified custodian, call our main office number on this brochure's cover page.

Termination

You may terminate the portfolio management agreement upon 30 days' written notice. You will incur a pro-rata charge for services rendered before the termination of the portfolio management agreement, which means you will incur advisory fees only in proportion to the number of days in the quarter for which you are a client. If you have pre-paid advisory fees that we have not yet earned, you will receive a prorated refund of those fees.

Additional Fees and Expenses

We may recommend mutual funds and ETFs. The fees you pay us are separate from the fees these funds charge. The broker-dealer or custodian handling your transactions also imposes transaction charges and brokerage fees when you buy or sell securities. We do not receive any portion of these fees. Review all fees charged by the funds, ETFs, our firm, and others to understand your total costs. For details on our brokerage practices, see the Brokerage Practices section of this brochure.

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

We do not charge performance-based fees or engage in side-by-side management. Performance-based fees are calculated based on a percentage of your investment gains, which can lead to conflicts of interest. Side-by-side management involves managing accounts with different fee structures simultaneously. Our fees are outlined in the Fees and Compensation section and are not tied to your account's capital gains or appreciation.

Item 7: Types of Clients

We provide investment advisory services for individuals and high-net-worth clients, including young families and retirees.

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

Our investment advice may involve fundamental analysis, which assesses individual companies based on financial statements, industry outlook, and management expertise. We also refer clients to third-party investment advisers ("outside managers") after evaluating their experience, investment strategies, and past performance.

Material Risks Involved

Investing carries inherent risks, including:

- **Market Risk:** Potential losses due to overall market declines.
- **Strategy Risk:** Uncertainty in the effectiveness of investment strategies.
- **Small and Medium Cap Company Risk:** Higher volatility and potential for business failure.
- **Turnover Risk:** Increased costs and tax implications from frequent trading.
- **Concentration Risk:** Exposure to specific sectors or asset classes.
- **Interest Rate Risk:** Impact of interest rate changes on bond prices.
- **Legal or Legislative Risk:** Changes in laws affecting investments.
- **Inflation:** Decrease in purchasing power over time.

Risks Associated with Securities

Various types of securities pose specific risks:

- **Commercial Paper:** Risk of default by issuers.
- **Common Stocks:** Volatility and potential loss in value during economic downturns.
- **Corporate Bonds:** Price fluctuations based on interest rates and credit quality.
- **Bank Obligations:** Vulnerability to economic changes and regulatory shifts.
- **Municipal Bonds:** Tax advantages but subject to market risks.
- **Options and Derivatives:** Complex risks, including potential total loss.
- **Exchange Traded Funds (ETFs):** Market price variations and tracking errors.
- **Mutual Funds:** Expenses and risks related to underlying fund performance.

Investment Strategy

We primarily practice passive investment management, using index mutual funds or ETFs to build diversified portfolios with low costs and tax efficiency. Passive management aims to match market returns rather than outperform them.

Our investment strategy involves a three-pronged approach to optimize your portfolio:

1. **Asset Allocation:** We determine the most appropriate mix of asset classes (stocks, bonds, cash, etc.) to align with your risk tolerance, financial goals, and investment time horizon. This helps to balance risk and return by spreading investments across different types of assets.
2. **Asset Location:** We strategically place different asset classes in taxable and tax-advantaged accounts (like IRAs or 401(k)s) to minimize tax impact and improve after-tax returns. This involves placing tax-efficient investments in taxable and tax-inefficient investments in tax-advantaged accounts.
3. **Asset Dedication:** We work with Asset Dedication, LLC to create tailored investment portfolios that align with your specific financial goals and timelines. This involves selecting low-cost mutual funds or ETFs that match your investment objectives while keeping costs and taxes low.

This comprehensive approach ensures that your portfolio is well-diversified, tax-efficient, and aligned with your financial goals. Our use of low-cost mutual funds and ETFs helps to minimize fees and maximize your investment returns over the long term.

Recommendation of Securities

We focus on creating well-diversified portfolios using index mutual funds or ETFs. This passive management strategy helps minimize costs and maximize tax efficiency, aiming to match overall market returns rather than outperform them.

Item 9: Disciplinary Information

We have no disclosures regarding legal or disciplinary events that would impact our advisory services or management integrity.

Item 10: Other Financial Industry Activities and Affiliations

None of our employees are registered as brokers or engage in futures trading. We do not have related parties or receive compensation from external sources, ensuring no conflicts of interest.

Kevin Jacobs, the principal of Step By Step Financial, also owns Step By Step Tax Solutions, LLC, a separate and affiliated company. While Step By Step Financial, LLC no longer includes tax preparation as part of its standard advisory services, Step By Step Tax Solutions, LLC provides tax preparation services independently.

Clients of Step By Step Financial may choose to engage Step By Step Tax Solutions, LLC for tax return preparation. There is no obligation to use Step By Step Tax Solutions, and clients are free to use any tax preparer of their choice.

Step By Step Tax Solutions operates out of the same office location and maintains its own business structure and service agreements.

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

Description of Our Code of Ethics

We strictly adhere to legal and regulatory requirements in our operations. Our Code of Ethics sets clear standards for all team members. We are committed to safeguarding your interests and upholding honesty, good faith, and fair dealing. Every member of our firm must follow these guidelines and report any violations. We also enforce policies to prevent misuse or unauthorized disclosure of your confidential information.

Clients or prospective clients can request a copy of our Code of Ethics by contacting us using the phone number provided on the cover page of this brochure.

Participation or Interest in Client Transactions

Our firm and associates do not maintain significant financial interests in client transactions beyond disclosed advisory services.

Personal Trading Practices

Our firm or associates may trade the same securities we recommend to you. This potential conflict of interest means we could benefit from more favorable prices. To prevent this conflict, our policy ensures that neither our firm nor its associates prioritize their trading over client transactions.

Item 12: Brokerage Practices

Depending on your total investment value and client agreement, we will recommend using the brokerage and custodial services of Fidelity or Altruist Financial LLC ("Altruist"). Your assets will be held in accounts with a "qualified custodian," typically a broker-dealer or bank. You incur higher commissions and trading costs than other providers.

We aim to recommend custodians with the best terms for holding your assets and executing transactions. This consideration includes factors such as the ability to execute securities transactions and provide related services, likelihood of efficient trade execution, availability of investment research tools, overall service quality, competitiveness of pricing, reputation, financial stability, and reliability, as well as existing relationships with our firm and other clients.

Regarding research and other services, we do not participate in soft dollar programs offered by Fidelity or Altruist, and we do not receive research or other benefits in exchange for placing trades through them.

As registered investment advisers, we have access to institutional platforms through your custodians. These include research products and services, financial publications, company and industry information, research software, and other lawful tools that aid in our investment decision-making process. These services are standard for all advisers using institutional service platforms and are not funded through soft dollars. However, commissions charged by brokers may be higher than those not providing research services.

Additionally, we offer investment advisory services through the custodial platform Altruist Financial LLC provides, which is an SEC-registered broker-dealer and FINRA/SIPC member. Altruist handles custody, clearing, and execution services as a self-clearing broker-dealer. Step By Step Financial LLC clients establish brokerage accounts through Altruist, benefiting from a fully digital account opening process, diverse investment options, and integration with software tools that enhance the services provided.

It's important to note that Step By Step Financial LLC is not affiliated with Altruist. Altruist does not supervise Step By Step Financial LLC, its agents, activities, or its regulatory compliance.

Item 13: Review of Accounts

Account Monitoring and Reviews

Kevin F. Jacobs, CFP®, will monitor your accounts continuously and conduct formal reviews at least annually to ensure that our advisory services align with your investment needs and objectives. More frequent reviews can be arranged at your request or due to significant changes in economic conditions, financial situation, or substantial deposits or withdrawals. You should inform Kevin F. Jacobs, CFP®, of any changes in your financial situation that could impact your investment plan. Significant market, economic, or political events may prompt additional reviews.

Brokerage Statements and Account Access

Clients will receive brokerage statements at least quarterly directly from the Custodian. These statements detail all positions, transactions, and fees related to the client's accounts. Clients can also establish electronic access to the Custodian's website to view their reports and account activity.

Item 14: Client Referrals and Other Compensation

Compensation and Client Referrals

We do not receive any compensation from any third party for providing investment advice to you, nor do we compensate any individual or firm for client referrals. Please refer to the Brokerage Practices section above for disclosures on research and other benefits we may receive from our relationship with your account custodian.

Step By Step Financial receives compensation for managing two 401k plans. The plans are charged .7% for the first \$1,000,000 managed and .5% for amounts above \$1,000,001. We also receive minimal compensation for tax returns completed for clients.

Item 15: Custody

Payment of Advisory Fees

Your independent custodian may directly debit your account(s) to pay our advisory fees, which means we exercise limited custody over your funds or securities. We do not have physical custody of any of your funds or securities. Your funds and securities will be held with a qualified custodian, such as a bank or broker-dealer.

You will receive account statements from the qualified custodian(s) holding your funds and securities at least quarterly. These statements will show the amount of our advisory fees deducted from your account(s) each billing period. It is essential to review these account statements carefully for accuracy.

You will provide written authorization to Step By Step Financial, LLC, permitting them to be paid directly from your account held by the custodian.

We will also provide statements showing the amount of the advisory fee deducted from your account. To reconcile the information, you should compare our statements with your account custodian(s) statements. If you have questions or did not receive a statement from your custodian, contact us immediately at the telephone number on the cover page of this brochure.

Payment Methods

Fees are paid via ACH bank debit or directly from your accounts held at one of our recommended custodians. All clients on the wealth management platform will have quarterly fees directly debited from their managed accounts. In contrast, clients on the wealth-building platform can either have their fees directly debited from their managed accounts or pay their fees directly from their bank account. We use AdvicePay to process our ACH bank debits. Fees will be debited in the most tax-efficient way possible.

Item 16: Investment Discretion

Non-Discretionary and Discretionary Management

- **Non-Discretionary Management**

We will seek your approval before making any transactions in your account. We will provide investment advice, but you will have the final say on whether to proceed with our recommendations. You can accept or reject our advice before transactions are made with your account.

- **Discretionary Management**

You grant us discretionary authority to manage your account. This means we can make investment decisions, including the selection and amount of securities to buy or sell, without needing your approval for each transaction. However, you can set your account's investment objectives, guidelines, and restrictions. For example, you can specify that investments in any particular stock or industry should not exceed specific percentages of the portfolio's value. All investment decisions will be made per your goals, priorities, and risk assessment.

Item 17: Voting Client Securities

Proxy Voting Rights

We do not vote proxies on behalf of your advisory accounts. However, we may offer advice regarding corporate actions and exercising your proxy voting rights if you ask. If you own shares of applicable securities, you are responsible for exercising your right to vote as a shareholder.

You will usually receive proxy materials directly from the account custodian. If we receive any written or electronic proxy materials, we will forward them to you by mail or electronically, as authorized.

Item 18: Financial Information

Financial Condition and Impairment

Our firm has no financial condition or impairment that would prevent us from meeting our contractual commitments to you. We do not take physical custody of client funds or securities or serve as trustee or signatory for client accounts. We do not require prepayment of more than \$500 in fees six or more months in advance, so we do not need to include a financial statement with this brochure.

We have not filed a bankruptcy petition in the past ten years.

Item 19: Requirements for State-Registered Advisers

Educational Background and Business Experience of Principal Officer

Refer to Part 2B for background information about our principal executive officers, management personnel, and those advising on behalf of our firm.

Other Business Activities of the Principal Officer

Kevin Jacobs, the principal of Step By Step Financial, also owns Step By Step Tax Solutions, LLC, a separate and affiliated company. Step By Step Tax Solutions, LLC provides tax preparation services. This activity amounts to 5% of his time on a monthly basis.

Performance Fee Calculations

Neither our firm nor any persons associated with our firm are compensated for advisory services with performance-based fees. Refer to the Performance-Based Fees and Side-By-Side Management section above for more information.

Disciplinary Information

There are no legal, civil, or disciplinary events to disclose regarding Step By Step Financial, LLC, or Kevin F. Jacobs, CFP®. Neither our firm nor our management persons have any reportable arbitration claims, civil, self-regulatory organization proceedings, or administrative proceedings.

Material Relationships with Issuers of Securities

Neither our firm nor our management persons have a material relationship or arrangement with any securities issuer.

ADV Part 2B



Step By Step Financial, LLC

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June 4, 2025

Form ADV Part 2B Brochure Supplement

This brochure supplement provides additional information about Kevin F. Jacobs, CFP®, and Step By Step Financial, LLC. You should have already received a copy of the Step By Step Financial, LLC. If you did not receive it or have any questions about the information in this supplement, please contact us at 918-806-1030 or kjacobs@stepbystepfinancial.com.

Further details about Kevin F. Jacobs, CFP®, can be found on the SEC's website at www.adviserinfo.sec.gov, or you can contact us at 5034037.

Item 2: Educational Background and Business Experience

Kevin F. Jacobs, CFP®

Year of Birth: 1976

Education:

- Christian Brothers University: Executive Certificate in Financial Planning, January 2007
- Madonna University: Master's Degree in Theological Studies, June 2005
- Franciscan University of Steubenville: B.A. in Theology, May 2000

Business Background:

- Step By Step Tax Solutions, LLC: Sole Owner, June 2025 - Present
- Step By Step Financial, LLC: Sole Owner and Investment Adviser Representative, March 2008 - Present
- Shoemaker Financial: Financial Advisor, 2005 - 2007
- HR Block: Tax Professional, 2005 - 2007

Professional Designations, Licensing & Exams:

CFP® (Certified Financial Planner): The CFP® certification is a professional designation awarded by the Certified Financial Planner Board of Standards, Inc. It is recognized for its high standard of professional education, stringent code of conduct, and ethical requirements.

To attain the CFP® certification, individuals must:

- Complete an advanced college-level course of study in financial planning and hold a Bachelor's Degree.
- Pass the comprehensive CFP® Certification Examination.
- Have at least three years of full-time financial planning-related experience.
- Agree to abide by the CFP Board's Standards of Professional Conduct.

To maintain the CFP® certification, individuals must complete 30 hours of continuing education every two years and renew their agreement to abide by the Standards of Professional Conduct.

Item 3: Disciplinary Information

Kevin F. Jacobs, CFP®, has no disclosures required under this item.

Item 4: Other Business Activities

Kevin Jacobs, the principal of Step By Step Financial, also owns Step By Step Tax Solutions, LLC, a separate and affiliated company. Step By Step Tax Solutions, LLC provides tax preparation services. This activity amounts to 5% of his time on a monthly basis.

Item 5: Additional Compensation

Kevin F. Jacobs does not receive additional compensation or economic benefits for providing advisory services.

Item 6: Supervision

Step By Step Financial, LLC's Sole Owner and Investment Adviser Representative, Kevin F. Jacobs, supervises the firm's advisory activities. He can be reached at 918-806-1030.

Item 7: Requirements for State Registered Advisers

Kevin F. Jacobs has no reportable arbitration claims, has not been found liable in any civil, self-regulatory organization, or administrative proceeding, and has not been the subject of a bankruptcy petition.