

Firm Brochure Form ADV Part 2A

Sanctuary Financial Planning, LLC

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Item 1: Cover Page

This Brochure provides information about the qualifications and business practices of Sanctuary Financial Planning, LLC. If you have any questions about the contents of this Brochure, please contact us at (704) 705-8773. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

Sanctuary Financial Planning, LLC is a registered investment adviser. Registration does not imply a certain level of skill or training.

Additional information about Sanctuary Financial Planning, LLC also is available on the SEC's website at <u>www.adviserinfo.sec.gov</u>, which can be found using the firm's CRD number, 325857.

Item 2: Material Changes

We initially provide you with a copy of our Brochure when we enter into an agreement with you. On an annual basis, we will provide you with a Summary of Material Changes within 120 days of our fiscal year end. In the alternative, we may choose to provide you with a complete copy of our Brochure.

We will promptly update this Brochure when material changes occur. Material changes are summarized in this section. In the future, any material changes made during the year will be reported here.

Since our last annual amendment dated March 13, 2025, we have made the following material changes:

- Item 4: Advisory Business We have updated the types of financial planning services we offer. We have also added investment management as a service offering.
- Item 5: Fees and Compensation We have updated our pricing for our financial planning services. We have also included pricing for our new investment management services.

Note that we may have made other changes that are editorial in nature, to correct grammatical or typographical errors, to provide additional information or clarifications, or to correct formatting issues. We do not consider these changes to be material.

You may request a current copy of our Brochure at any time without charge by contacting us at (704) 705-8773. You may also obtain a copy of our current Brochure from the SEC's website at <u>www.adviserinfo.sec.gov</u>, which can be found using the firm's CRD number, 325857.



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Item 4: Advisory Business

Who We Are

Sanctuary Financial Planning, LLC ("SFP") is a financial advisory firm based in North Carolina. We are a limited liability company founded in March 2023 and registered as an investment adviser in North Carolina in April 2023. We are also registered in California (as of July 2024) and Virginia (registration pending) and notice-filed in Texas. Our firm is owned by James ("Jim") Charles and Sarah Charles. Jim Charles also serves as our Chief Compliance Officer ("CCO").

SFP is a fee-only, fiduciary financial planning firm. Our sole source of revenue is the transparent fees paid directly by our clients. We do not receive commissions, referral fees, or compensation from third-party companies of any kind.

We provide a broad range of services—offered through hourly, flat-fee, and project-based pricing models—to meet clients where they are. This includes:

- Comprehensive financial planning on an ongoing or as-needed basis
- Flat-fee investment guidance for clients who manage their own portfolios
- Flat-fee investment management for those who wish to delegate portfolio oversight (We do not charge asset-based fees or earn compensation based on assets under management)

While we may recommend outside professionals—such as attorneys, tax advisors, or insurance agents, when appropriate—clients are never required to work with any particular provider, and we receive no financial benefit from such referrals.

As a fiduciary, we are legally and ethically obligated to act in your best interest at all times. We believe in delivering conflict-free advice with clarity, transparency, and a deep commitment to your financial well-being.

Our Services

We tailor our advisory services to the individual needs and life stages of our clients. We provide financial planning services primarily through virtual consultations and offer a wide range of options including hourly planning, comprehensive flat-fee planning packages, investment guidance, and investment management. Each service is explained in more detail below.

Key Principles of Our Advisory Services

- **No Product Sales:** We do not sell financial products. If we recommend investments, insurance, or legal services, you are free to choose any provider you prefer.
- Fee-Only No AUM or Commissions: We do not charge fees based on a percentage of assets under management ("AUM"), and we do not receive commissions or compensation from third-parties. Our only compensation comes directly from the fees you pay—whether hourly, flat-fee, or as part of an ongoing planning engagement—based on the scope and complexity of your needs.
- **Client-Directed Investment Control (Optional):** Unless you specifically engage us for investment management, you retain full control over your accounts. We provide guidance and oversight, but implementation is your responsibility unless otherwise agreed upon.

Financial Planning

Our financial planning services are delivered through a structured yet flexible process—designed to adapt as your life evolves.

You might come to us with a specific goal—like preparing for retirement, managing cash flow, or saving for education. Or you might simply want to feel more in control. Wherever you are, we meet you there.



Over time, your plan may include:

- Building a spending and savings plan that fits your lifestyle
- Mapping out your path to financial independence
- Clarifying how to fund your children's education
- Aligning your investments with your values and goals
- **Reducing tax surprises** and optimizing income strategies
- Making sure you're protected when life throws a curveball
- Coordinating your estate wishes and legacy goals

You'll receive a personalized planning summary, actionable recommendations, and the ongoing support to follow through—all designed to help you live well, with clarity and confidence.

Foundation Plan (initial flat-fee planning engagement)

One plan. Infinite Paths.

We don't do one-size-fits-all planning. But we believe every client deserves a strong foundation—one that brings clarity, confidence, and direction, no matter where you are in life.

That foundation is our **Foundation Plan**—a year-long, flat-fee engagement that provides baseline analysis and personalized recommendations across your financial life. It's structured yet flexible, with support throughout the year and the ability to revisit and refine your plan as your life evolves.

This multi-meeting process includes:

- Before the Numbers: A values-based discovery to understand your money story, beliefs, and priorities.
- The Financial Framework: Scenario modeling and strategic planning to align income, savings, investments, and goals.
- **Risk, Protection, & Preparation:** High-level tax, insurance, and estate reviews—designed to identify blind spots and create resilience.

You'll receive a Strategic Planning Summary, scenario analysis, and actionable next steps—plus tools to help you make confident decisions.

Ongoing Flat-Fee Financial Advice

Financial planning isn't a one-time event. Life shifts. Priorities evolve. Needs—and laws—change. That's why we offer annual, renewable planning relationships designed to support you as life evolves.

Each ongoing engagement begins at our minimum service level, which includes:

- Annual Strategy Session: A full plan update and recalibration around your current goals.
- Annual Tax Letter: A proactive, personalized tax strategy summary for the year ahead.
- Ongoing Support: Responsive planning as life evolves—life transitions, what-ifs, and everything in between.

Our planning model is modular, allowing us to adjust the level of service based on your evolving needs. Some years are focused on maintenance; others involve more complexity and require deeper engagement. Either way, we revisit your goals annually and determine together how best to move forward. (For fee details, including add-ons and customization options, see <u>Item 5</u>.)



Custom Planning Add-Ons

No two financial lives are the same. That's why our services are modular. You can layer in additional support across areas like:

- Roth conversion and tax strategy
- Equity compensation
- Long-term care and insurance analysis
- Home and relocation planning
- Philanthropy, legacy, and education strategy

All fees are flat and transparent. You only add what's relevant—when the time is right. (For fee details, including add-ons and customization options, see <u>Item 5</u>.)

Hourly Financial Planning and Consulting

For clients who prefer flexibility or have a specific question in mind, we offer financial planning and consulting on an hourly basis. Hourly engagements are well-suited for:

- Focused planning needs (e.g., pension decisions, insurance reviews)
- Single-scenario modeling
- One-time planning needs without a year-long commitment

The number of hours required depends on the scope and complexity of the work. Factors that may influence complexity include: multiple investment accounts; business ownership; equity compensation (e.g., stock options, restricted stock units), and major life events, such as divorce, inheritance, or relocation.

Hourly engagements include a written summary of recommendations and 30 days of follow-up support. Additional support can be provided upon request, or you may re-engage at any time.

California Code of Regulations Disclosure

Under California Code of Regulations Section 260.235.2, for clients who receive our financial planning services, we must state when a conflict exists between the interests of our firm and those of our client. Clients are not obligated to act upon our recommendations or to effect any transaction through our firm.

Investments

Your financial plan sets the destination. Your investments help fund the journey.

At SFP, investment advice is always optional—and always personal. Whether you prefer to delegate entirely or stay hands-on with guidance, we offer two distinct ways to support your investment strategy.

Flat-Fee Investment Management (Discretionary)

We offer investment management services on a discretionary basis, meaning we can implement changes to your portfolio without advance notice or approval. This allows us to manage your investments efficiently and in alignment with your goals, risk tolerance, and time horizon.

Investment management is typically available as an optional add-on for clients receiving our ongoing financial planning services, and is billed as a separate flat fee. In some cases, we may offer this as a standalone service.

At the minimum service level, our flat fee includes:



- **Portfolio Implementation and Account Monitoring:** We implement and manage your investment portfolio using a diversified, evidence-based strategy. This includes ongoing monitoring of up to five client accounts, rebalancing as needed, and making allocation adjustments to keep your portfolio aligned with your goals.
- Performance Updates: Regular reporting and insights regarding your investments.

We may adjust your fee based on portfolio complexity, account structure, coordination needs, and other service factors. (See <u>Item 5</u> for details on fee structure and complexity considerations.)

Limitations of Service

Our investment philosophy is grounded in broad diversification and research-backed strategies. As such, we do **not** offer:

- Bond ladder construction
- Individual stock selection or analysis
- Cryptocurrency transactions or custody
- Direct indexing strategies

If you come to us with any of these already in place, we may either help you unwind them or simply exclude those assets from ongoing management.

Importantly, you are not required to engage our investment management services to work with us. If you prefer to manage your own portfolio or maintain existing arrangements, we're happy to provide planning support, strategy, or investment guidance as needed.

Investment Guidance & Oversight (Non-Discretionary)

For clients who want to stay in control of their investments but value strategic input, we offer **non-discretionary investment guidance and oversight**.

This includes:

- A **one-time portfolio review** to analyze holdings, evaluate allocation, and provide tailored, plan-aligned recommendations
- Implementation guidance, including streamlining or consolidating accounts where appropriate
- Optional **ongoing strategy sessions** to revisit recommendations, assess alignment with your financial plan, and provide accountability

We assume you'll implement any changes yourself, but we're here to offer perspective as life—and the markets evolve. This service is ideal for clients who are hands-on but want expert input and structure. We typically recommend one or two check-in meetings per year.

(For billing information, including one-time and ongoing fees for this service, see Item 5.)

What's Next Coaching (Retirement Life Design)

SFP offers retirement coaching as a modular, life design-focused service for clients preparing for or transitioning into retirement. This service is available as a standalone engagement or as an add-on to an existing financial planning relationship.

Coaching is delivered through a structured series of conversations designed to help clients explore key non-financial aspects of retirement, including identity, purpose, lifestyle, and transitions. Common areas of focus include:

• Defining a meaningful post-career vision



- Assessing emotional and financial readiness
- Exploring routines, relationships, and purpose
- Planning for flexibility and future adjustments

Retirement coaching is not investment advice or financial planning, but it may be offered in conjunction with those services. Fees vary based on the scope of engagement and are disclosed separately in <u>Item 5</u>.

Other Services

Speaking Engagements

Sarah Charles and Jim Charles, founders of SFP, are public speakers and educators. They may be engaged to provide presentations on financial topics such as women's financial confidence, the value of advice, personal finance strategies, financial considerations in divorce, and general financial planning and investment principles. These engagements are educational in nature and do not include individualized investment advice.

Divorce Consulting

Jim Charles is a Certified Divorce Financial Analyst ("CDFA[®]"). He may be engaged for consulting services in divorces to act as a financial neutral, helping both parties understand their financial situation, or as a financial divorce consultant, working with one party and their attorney to analyze marital assets.

Types of Investments

We generally employ or recommend long-term buy-and-hold investment strategies, using diversification and research-backed methods of analysis. We do not construct or manage individual bond ladders, pick individual stocks, or engage in market timing. We will typically recommend mutual funds and exchange-traded funds for our clients' investment portfolios, but we could also recommend other types of investments, when appropriate based on a client's circumstances. See <u>Item 8</u> below for additional information on our portfolio management practices.

How We Customize and Recalibrate Your Financial Plan

Our financial planning services are structured to be both customized and flexible. Each flat-fee planning engagement is designed to reflect your goals, circumstances, and priorities—and is structured as a one-year agreement.

When your engagement comes up for renewal each year, we revisit the scope of work together. We'll discuss what's changed in your life, what's on the horizon, and whether your financial needs, investment preferences, or planning objectives require an adjustment to your plan—or the level of support.

You may request reasonable restrictions on investments or planning recommendations by submitting them in writing. While we make every effort to accommodate such requests, certain investment vehicles—such as mutual funds and exchange-traded funds—may limit our ability to enforce underlying restrictions due to their structure. If we're unable to apply a requested restriction, we'll let you know.

Our financial plans and investment strategies rely on the information you provide. If that information is incomplete or inaccurate, the recommendations we develop may not be appropriate for your situation. All planning is based on reasonable assumptions about market performance, inflation, interest rates, and other economic factors. These assumptions are informed by historical data, but we do not—and cannot—guarantee future results or outcomes.

Wrap Fee Programs

We do not participate in wrap fee programs.



Assets Under Management

SFP began offering investment management services in 2025. Consequently, as of the end of our last fiscal year, December 31, 2024, we did not manage any assets on a discretionary or non-discretionary basis. This section will be updated at least annually to reflect our assets under management as of December 31 each year.

Item 5: Fees and Compensation

Important Notice

If you have received this Brochure less than 48 hours prior to signing a client engagement agreement, you can cancel the agreement within five business days of signing without incurring any penalties or advisory fees.

Our Fee Structure

We offer both flat-fee and hourly pricing models, depending on the type of service and the complexity of your financial needs. All fees are disclosed in advance and outlined in your client engagement agreement. Fees are generally not negotiable, though SFP may offer discounts, custom fee arrangements, or fee waivers at our discretion. You may be able to obtain similar services at a lower cost from other providers.

No fee increases will occur without your prior consent. Below is an overview of our standard fee structures.

Engagement Structure and Billing Practices

SFP offers ongoing advice under a flat-fee model, structured as a 12-month planning relationship. This structure allows us to deliver meaningful advice over time, while keeping billing predictable and transparent.

- Except for hourly financial planning, all planning engagements are scoped as annual commitments, with fees reviewed and adjusted as needed at the end of each 12-month period.
- Billing frequency is selected by the client—monthly, quarterly, or semi-annually—and charged in advance in equal installments.
- We do not bill based on the number of meetings or how quickly the client moves through the planning process. The pace of engagement is flexible and client-driven.
- At the conclusion of each 12-month engagement period, we conduct a formal check-in to reassess the client's goals, circumstances, and overall level of support required. Based on this review, we will update the scope of services and recalibrate the corresponding fee to reflect the client's evolving needs and complexity. We will provide an updated client engagement agreement outlining the revised scope and fee for the following 12-month period.

This model is designed to support thoughtful planning, adapt to life changes, and keep the advisor-client relationship aligned over time.

Financial Planning

All flat-fee financial planning engagements are structured as 12-month agreements. Fees are billed monthly, quarterly, or semi-annually in advance. Your plan and pricing are reviewed annually to reflect any changes in scope or complexity.

Foundation Plan

This is the initial planning engagement that includes three planning conversations and a personalized planning summary.

Flat fee: \$4,500 per year



Ongoing Flat-Fee Financial Advice

After completing the Foundation Plan, clients may engage us for ongoing advice. This relationship includes annual plan reviews and updates, tax strategy letters, and responsive planning support throughout the year.

- Minimum annual flat fee: \$2,500
- Billed monthly, quarterly, or semi-annually in advance

Each year, we revisit the scope of engagement together and adjust your plan and pricing based on your goals, complexity, and level of support needed.

As life evolves, you may also choose to add specific planning modules during the year. These are billed as one-time, flat fees and are designed to address areas like equity compensation, long-term care, or retirement strategy as they become relevant.

Custom Add-Ons

Optional modules may be added based on your needs and life stage. Each add-on is a one-time, flat fee and may be added during the year or built into your annual engagement.

Add-On	What's Included	Ideal For	Fee
Tax & Wealth Strategy	•		
Equity Compensation Strategy	Incentive stock option/non-qualified stock option/restricted stock unit review, tax strategy, liquidity planning	Executives with concentrated equity, start-up founders, tech employees	\$1,500
Roth Conversion Planning	Scenario analysis, bracket mapping, multi-year tax strategy, accountant coordination	Pre-retirees, high earners, tax- deferred asset holders	\$1,750
Pension Strategy Analysis	Lump sum versus annuity analysis, income impact	Public employees, corporate staff with defined benefit pensions	\$350 per pension
Protection & Risk			
Long-Term Care Planning	Needs analysis, specialist quotes, underwriting guidance	Aging solo, dual planning, wealth protection	\$1,000
Life Insurance Review	Contract analysis, guidance on next steps	Clients with legacy insurance policies	~ \$500 - \$750 per contract (pass-through)
Annuity Review	Review and strategic analysis	Clients with existing annuity products	\$750 per contract
Estate Strategy & Coordination	Document review, professional coordination, integration with overall plan	Complex families, high net worth, legacy-focused, estate tax exposure	\$1,500
Life Planning & Legacy			
Education Planning	529 optimization, projections, multi- child strategy	Parents, grandparents, caregivers	\$150 per scenario
Philanthropy & Legacy Strategy	Giving strategy, donor-advised fund guidance, family values, communication tools	Clients seeking impact beyond wealth	\$500
Home & Relocation Planning	Move versus stay analysis, lifestyle alignment	Clients navigating housing shifts or second home decisions	\$750
Ongoing Flexibility Options			
Additional "What If" Scenarios	Beyond the one or two meetings included in the foundational plan	Explorers, decision-makers, multi-path planners	\$500 per scenario
Additional Meeting Review (available after the first year)	One or more formal planning sessions beyond the annual review	Clients who want semi-annual reviews, anticipate evolving complexity	\$750 per meeting

(See <u>Item 4</u> for details on what each module includes.)



Hourly Financial Planning and Consulting

Hourly services are billed at a standard rate of **\$450 per hour**. We typically require a minimum of four billable hours, but may waive this at our discretion. Prior to engagement, we will provide you with an estimated number of hours required to complete the project, based upon complexity of the analysis, scope of the project, or the research required to provide services, among other factors we deem relevant. We will bill you for the actual time spent on the project, which may be higher or lower than the estimate provided. Hours will be assessed in six-minute increments, and a partial increment will be treated as a whole. In certain cases, SFP may outsource planning work to specialized contractors who bill at a lower rate; in such cases, the client will be charged for the work done at the contractor rate. Fees are billed monthly in arrears and are due upon receipt of the invoice. The engagement will end upon delivery of the final report.

Flat-Fee Investment Management (Discretionary)

Your annual investment management fee starts at \$5,000 per year. That includes:

- Management of up to five accounts
- Exclusively SFP models
- No tax considerations
- Performance reporting

From there, we customize your fee based on the complexity and coordination required to manage your investments well.

Complexity Factors & Typical Impact				
Category	Examples	Typical Impact (per factor)		
Portfolio Transition (Applies primarily in Year 1	Number of custodians, holdings, rollovers,	\$500 - \$2,000		
or during major portfolio transitions, such as	account distributions, capital gains			
changing custodians, rolling over assets, account	considerations			
distributions, repositioning taxable accounts)				
Account Complexity (Structural, administrative,	Number, type, and structure of accounts;	\$500 - \$1,500		
logistical effort)	money movement coordination; inherited			
	IRAs; frequency of distributions			
Portfolio Complexity (Strategy, tax planning,	Roth conversion planning, required	\$1,000 - \$2,000		
investment nuance)	minimum distribution strategy, qualified			
	charitable distributions, embedded capital			
	gains, legacy positions			
Coordination Complexity	Ongoing collaboration with your	\$500 - \$2,000		
	accountant or estate attorney, custom			
	income or gifting strategies,			
	multigenerational planning, family			
	business or entity structures			

Here's how we evaluate the scope of your portfolio and assign a fair, transparent fee:

Planning for Life's Transitions

Life doesn't always go according to plan. And sometimes, that's a good thing. If you experience a major life event like a divorce, inheritance, business sale, or sudden windfall—we'll work together to adjust your financial plan and investment strategy to reflect your new reality.

Some events are unexpected. Others you can see coming—and we'll plan accordingly from the start.

If your needs change significantly along the way, we may apply a one-time or temporary fee adjustment. As always, we'll talk it through together so there are no surprises.



This service is offered as a 12-month engagement and is renewed annually. This service is typically offered as an optional add-on to clients receiving our ongoing financial advice services. On a case-by-case basis, we may offer investment management as a standalone service.

Investment Guidance & Oversight

We offer strategic investment support for clients who wish to remain hands-on with their portfolios but want access to professional insight and structure.

Initial Investment Guidance (Non-Discretionary)

This service includes a comprehensive portfolio review and recommendations aligned with your financial plan.

- Fee: \$350 per account or portfolio analyzed, plus a \$500 meeting fee
- Includes allocation review, implementation suggestions, and strategic recommendations

Ongoing Investment Oversight (Non-Discretionary)

For clients who want periodic strategy check-ins, we offer non-discretionary investment oversight throughout the year.

- Fee: \$1,000 per meeting
- We typically recommend one or two meetings per year, based on the client's needs

Clients are responsible for executing trades and implementing any recommendations. These services do not include discretionary portfolio management or ongoing account monitoring.

What's Next Coaching

We offer retirement coaching as a standalone or add-on service to help clients prepare for and navigate the transition into retirement. Pricing is based on the number of sessions.

Coaching Format	Flat Fee
Individual Session (à la carte)	\$750
Full Series (4 sessions)	\$2,500
Annual Retirement Check-In (follow-up)	\$500

Coaching is non-investment, non-advisory, and focused on life design, identity shifts, and purpose during retirement.

Other Services

Speaking Engagements

Due to the wide variance in the complexity, content, and scope of speaking engagements, fees are negotiable on an individual basis and may range from \$0 to \$10,000. Fees could vary based on the topic, audience size, and preparation time. Speaking engagements may be provided on a pro bono basis at our discretion. Fees are paid at the completion of the engagement. In some cases, we may require a partial payment in advance to cover any travel expenses or work performed in advance of the engagement.

Divorce Consulting

Divorce consulting services are provided on an hourly basis, typically at our rate of \$450 per hour. This fee is negotiable, and we reserve the right to offer fee discounts at our discretion. Fees are typically paid by either the attorney or law firm that engages our services or directly by the client. Fees are paid monthly in arrears.



Payment Methods

All Non-Investment Management Services

Fees for financial planning, retirement coaching, investment guidance and oversight, hourly consulting, and other advisory services (excluding discretionary investment management) are paid via electronic funds transfer or credit card through our secure third-party payment processor, AdvicePay.

Clients will receive a secure payment portal and will input their payment information directly. SFP does not have access to client payment credentials at any time. Clients may choose to pay fees monthly, quarterly, or semi-annually in advance, depending on the service and engagement structure.

Investment Management Fees

Clients can choose to:

- Have fees debited directly from investment accounts, billed quarterly in advance, or
- Pay via AdvicePay (electronic funds transfer or credit card) with the option to pay monthly, quarterly, or semi-annually.

All payment preferences are selected and documents at the time of engagement.

Other Fees You May Incur

While working with us, you may encounter additional third-party fees, such as: custodial fees or brokerage commissions, transaction fees (such as wire transfer or fund redemption fees), transfer taxes, investment product fees (such as mutual funds and exchange-traded funds), other professional fees (such as attorneys or accountants), and other related costs and expenses. These fees are separate from and in addition to SFP's advisory fees, and we do not receive any portion of these fees.

<u>Item 12</u> below describes the factors we consider when recommending custodians for your brokerage accounts and determining the reasonableness of their compensation (such as commissions). We do not receive compensation for the sale of securities or other investment products, for referral fees, or from third-party financial products or services.

Cancellation and Refunds

Financial Planning

Financial planning engagements may be cancelled at any time with written notice. For our customizable flat-fee financial planning packages and ongoing financial advice, the final fee will be prorated based on the number of days services were provided during the billing period. After deducting the final fee, the balance of any prepaid fees will be refunded to you promptly via the original payment method or check. For hourly financial planning and consulting, fees will be billed for work performed and will be due upon receipt of the final invoice.

We will provide you with any completed deliverables. However, please note if the client engagement agreement is terminated prior to completion, the scope and/or soundness of any analysis or other work product made prior to completion could be limited, inaccurate, or incomplete due to the early termination.

Investment Management Services

Investment management engagements may be cancelled at any time with written notice. The final fee will be prorated based on the number of days services were provided during the billing period. After deducting the final fee, the balance of any prepaid fees will be refunded to you promptly via the original payment method or check.

Other Services

Speaking engagements and divorce consulting may be cancelled at any time with written notice. For speaking engagements, if a partial payment is paid in advance, we will refund you the balance after deducting any non-



refundable travel expenses incurred and for work already performed prior to the engagement at any hourly rate of \$450. Refunds will be made promptly via the original payment method or check. For divorce consulting, fees will be billed for work performed and will be due upon receipt.

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

We do not charge performance-based fees, which are fees based on a share of capital gains in your account. In addition, we do not perform side-by-side management, which refers to the practice of simultaneously managing accounts that pay performance-based fees (such as a hedge fund) and those that do not.

Item 7: Types of Clients

We provide financial planning and investment management services to individuals, high net worth individuals, charitable organizations, trusts, and estates. We also provide speaking engagements to businesses and other organizations. Divorce consulting services are provided to family law attorneys or law firms. There are no minimum income or net worth requirements to become a client of SFP.

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

Methods of Analysis

When analyzing and recommending investments and strategies to our clients, we use the below methods of analysis:

Modern Portfolio Theory

We base our investment recommendations on Modern Portfolio Theory, a Nobel-prize winning investment methodology widely used by institutional investors. Modern Portfolio Theory is based on the following principles:

- **Risk and Return:** There are trade-offs between risk and return. Risk and investment return are related and an increase in risk requires an increased expected return.
- Market Efficiency: Securities are fairly priced based on information available to all investors.
- **Portfolio Design:** The design of the portfolio, such as asset allocation, is more important than the selection of individual stocks.
- Long-Term Investing: Holding investments over long periods of time (such as many years) improves success.
- **Diversification:** Spreading investments across asset classes and geographic regions reduces risk.

Mutual Fund and Exchange-Traded Fund Analysis

When analyzing mutual funds and exchange-traded funds, SFP evaluates investment options using various sources, including, but not limited to, financial publications, investment analysis software, corporate rating services, fund prospectuses and regulatory filings, and research from Dimensional Fund Advisors.

Investment Strategies

SFP follows a long-term, buy-and-hold investment strategy. We believe clients are best served by low-cost, globally diversified portfolios that prioritize asset allocation over market timing. Whenever possible, we use mutual funds and exchange-traded funds to keep costs low and efficiently maintain broad market exposure.



Index Investing

Index investing involves building a portfolio using low-cost funds that track specific market indexes. This approach helps investors capture broad market performance while keeping costs low. Index investing is known for its low fees, minimal trading activity, and tax efficiency, making it a simple and effective way to invest over the long term.

Systematic Active (Factor-Based) Investing

While index investing provides a strong foundation, we also recognize the benefits of systematic active investing, sometimes called factor-based investing. This strategy is based on decades of academic research and focuses on capturing reliable sources of expected returns, such as value, size, and profitability. Unlike traditional active investing, which relies on stock picking or market timing, systematic active investing uses a structured, rules-based approach to emphasize investments with favorable characteristics while maintaining broad diversification. This evidence-driven strategy aims to enhance returns while keeping costs and taxes low.

Asset Allocation

Asset allocation is the process of spreading investments across different asset classes, such as stocks, bonds, and cash, to balance risk and return. A well-diversified portfolio combines investments with different characteristics, helping to reduce the impact of market ups and downs. While asset allocation helps manage risk, it does not eliminate it, and an improper mix of assets can lead to underperformance. Regular reviews help ensure that the strategy aligns with an investor's long-term goals.

Risks of Loss

All investments come with risk, and you could lose some or all of your original investment. It is important to be financially prepared for this possibility. While all investments involve some level of risk, some carry higher risks or costs than others. There is no guarantee that your investment strategy will help you reach your goals, nor can we promise profits or protection from losses. If you are investing in a fund or other financial product, we encourage you to read the prospectus or offering documents to fully understand the risks involved.

General Risks

General risks associated with investing include, but are not limited to:

- Market Risk: Investments may lose value due to market declines.
- Strategy Risk: Investment strategies or techniques may not work as intended.
- Small and Medium Cap Company Risk: Investments in smaller companies are often more volatile and less liquid than investments in larger companies.
- **Turnover Risk:** Frequent trading can result in higher transaction costs and in higher taxes, which may negatively affect the account's performance.
- Limited Markets: Certain securities may be less liquid (that is, harder to sell or buy) and their prices may be more volatile.
- Interest Rate Risk: Bond prices generally fall when interest rates rise, and the value may fall below par value of the principal investment. In general, bonds with longer maturities are more sensitive to price changes.
- **Reinvestment Risk:** When interest rates decline, investors may have to reinvest interest payments or principal at lower rates, reducing potential returns.
- Legal or Legislative Risk: Legislative changes or court rulings may impact the value of investments.
- Inflation: Inflation may erode the buying power of your investment portfolio, even if the dollar value of your investments remains the same.



Investment-Specific Risks

Apart from the general risks outlined above which apply to all types of investments, specific securities may have other risks, including, but not limited to:

- Exchange-Traded Funds: Exchange-traded funds hold securities to match the price performance of a specific market index or commodity price and are subject to the same market risks as the index or sector they are designed to track. Their prices may differ from the net asset value and their trading may be halted.
- **Mutual Funds:** Investors could have to pay taxes on capital gains distribution received by the mutual fund but not distributed to the investor, which may reduce the client's overall returns.

Item 9: Disciplinary Information

As a registered investment adviser, we are required to disclose material facts about any legal or disciplinary event that could be material to your evaluation of our advisory business or of the integrity of our management personnel. We do not have any legal or disciplinary events regarding our firm or our management personnel to disclose.

Item 10: Other Financial Industry Activities and Affiliations

Our firm and its management are not registered as broker-dealers or representatives of broker-dealers, nor are we in the process of registering as such. This means we do not buy or sell securities for clients for a commission like a brokerage firm would. Similarly, we are not registered as a futures commission merchant, commodity pool operator, commodity trading advisor, or in any role associated with one these entities.

Depending on your needs, we may suggest that you work with a separate, independent brokerage firm to handle the custody and trading of your investments. We have established relationships with certain custodians to help manage your accounts, and you can find more details about these arrangements in <u>Item 12</u> below.

Beyond these disclosed relationships, we do not have any affiliations with other financial firms that could create significant conflicts of interest with our clients. The only outside relationships we maintain are with contracted service providers who assist us in serving our clients.

Disclosure of Material Conflicts

All material conflicts of interest under California Code of Regulations Section 260.238(k) are disclosed regarding our firm, representatives, and employees, which could be reasonably expected to impair the rendering of unbiased and objective advice.

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

Code of Ethics

As a fiduciary, we are legally required to act in your best interest. To ensure this, we have adopted a formal Code of Ethics that guides our business practices. Acting in your best interest is at the heart of our ethical commitment and the foundation of how we operate. At SFP, we go beyond simply following the law—we are committed to acting with transparency, excellence, and responsibility in everything we do. We hold ourselves to the highest ethical standards, guided by the following principles:

- Integrity: We provide professional services with honesty and strong moral principles.
- **Objectivity:** We maintain impartiality and make recommendations based solely on a client's best interests.



- **Competence:** We continuously build and apply our knowledge to provide sound financial guidance.
- Fairness: We act fairly and reasonably, ensuring transparency about potential conflicts of interest.
- **Confidentiality:** We protect client information and only disclose it when legally required or with client consent.
- **Professionalism:** We conduct ourselves in a manner that upholds the credibility of our profession.
- Diligence: We put forth the necessary effort and care in serving our clients.

We regularly review and update our Code of Ethics to ensure it remains relevant and effective. Every year, all firm personnel must confirm their understanding of and adherence to these ethical principles. Clients and prospective clients may request a copy of our Code of Ethics at any time.

Participation or Interest in Client Transactions

We do not manage any proprietary funds or private investments; therefore, we do not have any material financial interest in any investments that may be used in client portfolios. We do not engage in principal transactions or agency cross transactions.

We invest predominantly in open-end mutual funds and exchange-traded funds, which helps to reduce conflicts of interest between trades made in the accounts of our firm and our personnel, even when such accounts invest in the same securities. However, in the event of other identified potential trade conflicts of interest, our goal is to place client interests first.

Personal Trading

Our firm and personnel could buy or sell securities the same as, similar to, or different from, those we recommend to clients. Investing in securities in which clients also invest presents potential conflicts of interest, as SFP or our personnel could benefit from market activity influenced by client transactions, there could be opportunity to prioritize personal trades over client trades, or timing overlap could lead to situations where personal trades receive better or execution than client trades when execution occurs at or around the same time. However, SFP's Code of Ethics requires our firm and employees to place client interests ahead of our own in all investment decisions and prohibits trading in a manner that disadvantages clients.

To reduce or eliminate conflicts of interest involving the firm or personal trading, we could restrict or prohibit certain transactions in our firm's proprietary and personnel accounts. Any exceptions or trading pre-clearance must be approved by our Chief Compliance Officer in advance. Our Chief Compliance Officer also reviews firm and employee holdings and transaction reports as required by our Code of Ethics and securities regulations.

Item 12: Brokerage Practices

Our firm is not affiliated with any broker-dealers. Specific custodian recommendations are made to clients based on their need for such services. We recommend custodians based on the reputation and services provided by the firm.

For discretionary managed accounts under our investment management services, we have established a relationship with Charles Schwab & Co., Inc. ("Schwab"), member of the Financial Industry Regulatory Authority ("FINRA") and Securities Investor Protection Corporation ("SIPC"), though other custodial relationships could be added from time to time. We will recommend you use Schwab as your qualified custodian to facilitate our management of your accounts. We execute client transactions directly with the qualified custodian that holds the client account. We do not allow clients to direct us to execute transactions through a specific broker-dealer. Not all advisers require their clients to direct brokerage through a specific broker-dealer.

Schwab will hold your assets in a separate brokerage account and will buy and sell securities when we and/or you instruct them. Although we could recommend you use a particular custodian, you have the discretion to decide



whether to do so and will open your account directly with the custodian by entering into an account agreement directly with them. We do not open the account for you, although we can assist you in doing so. If you do not wish to place your assets with Schwab, we cannot manage your account for you on a discretionary basis. We do not provide non-discretionary investment management services. If you wish to hold your account with a different custodian, you are responsible for executing transactions and managing your account.

Through our participation in the adviser programs offered by Schwab, we receive various benefits, provided without cost or at a discount, which might not be available to retail customers. These benefits include access to certain investment options; execution of securities transactions; custodial services; access to an electronic trading platform; the ability to deduct our advisory fee from client accounts; access to client account data; receipt of duplicate trade confirmations and account statements; research-related products and tools; pricing and market data; access to software, technology, or services; attendance at educational conferences and events; consulting on technology, compliance, or other business matters; and access to industry publications. Some of these products and services could benefit you directly, while others could benefit us by assisting us in the administration of our business and the management of client accounts, including accounts held with other custodians.

The availability of these services does not depend on the number or value of brokerage transactions directed to Schwab. These services are available to all advisers who participate in their custodial program and are not provided in exchange for us directing client trades to Schwab. We do not direct client trades to a particular broker; all transactions are executed through the custodian that holds the client's account. Therefore, the services and benefits that we receive from a custodian are not considered soft dollar arrangements. The receipt of these benefits from the custodians creates a potential conflict of interest, as we could have an incentive to recommend you maintain your account with a specific custodian. However, we strive to recommend the custodian that is most appropriate for you based on your individual needs.

Note that individual custodians establish their own trading policies and procedures that limit our ability to control, among other things, the timing of the execution of trades. Execution of trades will not be instant, and we are not able to control the specific time during a day that securities are bought or sold. Custodians will generally trade on the same business day as they receive instructions from you or from us. However, transactions will be subject to processing delays in certain circumstances (such as orders initiated on non-business days or after markets close).

Best Execution

We recognize our obligation to seek best execution for our clients. However, it is our belief that the determinative factor is not always the lowest possible cost but whether the selected custodian's transactions represent the best qualitative execution while taking into consideration the full range of services provided. Therefore, our firm will seek services involving competitive rates, but they will not necessarily correlate to the lowest possible rate for each transaction. We have determined trading our clients' accounts through a preferred custodian is consistent with our firm's obligation to seek best execution of your trades. We regularly review and consider the overall quality and price of the services received from our preferred custodians in light of our duty to seek best execution.

Brokerage for Client Referrals

We do not receive client referrals from any broker-dealer or custodian.

Order Aggregation

Investment advisers can elect to purchase or sell the same securities for several clients at approximately the same time when they believe such action could prove advantageous to clients. This process is referred to as aggregating orders, batch trading, or block trading. We do not engage in order aggregation. It should be noted that implementing trades on an aggregate basis could be less expensive for client accounts. However, it is our trading policy to implement all client orders on an individual basis. Therefore, we do not aggregate client transactions. Considering the types of investments we hold in client advisory accounts, we do not believe clients are hindered in any way because we trade accounts individually. This is because we develop individualized investment strategies for clients



and holdings will vary. Our strategies are primarily developed for the long-term and minor differences in price execution are not material to our overall investment strategy.

Investment Opportunity Allocation

We seek to provide investment decisions in accordance with our fiduciary duties to you and without consideration of our economic, investment, or other financial interests. To meet our fiduciary obligations, we attempt to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios. Accordingly, we seek fair and equitable allocation of investment opportunities and transactions among our clients to avoid favoring one client over another over time. It is our policy to allocate investment opportunities and transactions we identify as being appropriate and prudent for our clients on a fair and equitable basis over time.

Item 13: Account Reviews

Financial Planning Services

For our customizable flat-fee financial planning packages and ongoing financial advice, we will provide a written or electronic report detailing your financial plan. The Investment Adviser Representative responsible for the client's relationship will review the financial plan and the client's progress towards goals or recommendations at least quarterly for the duration of the initial one-year engagement. If ongoing financial advice engagements are renewed for another year, we will provide an updated financial plan to reflect the client's current financial situation, desired goals, and anticipated future needs.

With our hourly financial planning and consulting, we will provide a written or electronic report detailing your financial plan. We typically do not provide any ongoing review, monitoring, or reporting.

Investment Management Services

With our investment management services, at least semi-annually, the Investment Adviser Representative responsible for your relationship will review the performance of your accounts and the applied investment strategy to ensure it remains appropriate. We could periodically adjust your account (a process referred to as rebalancing) to help ensure your investment portfolio remains consistent with your objectives, goals, and risk tolerances. Additional as-needed reviews and rebalancing could be conducted due to factors such as unusual or volatile performance, addition or deletions of client restrictions, or excessive withdrawals. Accounts could also be reviewed upon significant market, economic, or political events. We provide regular written or electronic reports, which include insights regarding your investments and portfolio.

Other Services

For speaking engagements and divorce consulting, we do not provide any ongoing review, monitoring, or reporting.

Item 14: Client Referrals and Compensation

Other than the benefits from custodians disclosed in <u>Item 12</u> above, we do not receive any economic benefit, directly or indirectly, from any third-party for advice rendered to our clients. Nor do we, directly or indirectly, compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

We do not accept physical custody of your funds or securities. However, as explained below, we could be deemed to have custody when we directly debit our advisory fees from your account, or if we are able to initiate transactions from your account to third-parties using a standing letter of authorization.



As explained in <u>Item 12</u> above, you will open and maintain your investment accounts with a qualified custodian. You will receive transaction confirmations and account statements directly from the custodian on at least a quarterly basis. We urge you to review these account statements carefully and compare them to any invoices or reports you receive from us. Information shown on custodial statements could vary from information shown on our invoices or reports for various reasons, such as differences in reporting dates, differences in accounting procedures, or valuation methodologies of certain securities. We encourage you to contact us at the phone number in <u>Item 1</u> of this Brochure with any questions about your statements, invoices, or other reports.

Deduction of Investment Advisory Fees

Under applicable securities regulations, we are deemed to have custody of client funds or securities if we debit our investment advisory fees directly from your account. When our fees are deducted from your account:

- We will obtain your written authorization to deduct our fees from your account.
- Each time a fee is deducted, we will send the custodian notice of the amount of the fee to be deducted from your account. At the same time, we will send a statement to you that itemizes the fee, including the formula used to calculate the fee, the amount of assets under management upon which the fee is based, and the time period covered by the fee.
- The custodian that holds your account will send you statements, on at least a quarterly basis, showing all disbursements from the account, including the amount of advisory fees.

Use of Standing Letters of Authorization

Custodians offer clients the ability to establish a standing letter of authorization ("SLOA") that allows their adviser to initiate transfers between client accounts at the same custodian, to initiate transfers to external accounts, or to request checks to be distributed from the client's account. These transactions can be first-party transactions (that is, transfers between internal or external accounts with the same account holder or checks distributed to the client at the client's address of record) or third-party transfers (transfers or checks to other parties).

Under applicable securities regulations, advisers are considered to have custody of client funds and securities if the adviser has the ability to initiate transfers from client accounts to third-parties under a SLOA. However, in most jurisdictions, an adviser is not deemed to have custody in the event of a first-party transaction.

When a client establishes a SLOA for a third-party transfer (or first-party transfers in jurisdictions where required), we will comply with each of the requirements and conditions outlined below:

- You will provide instructions to the custodian, in writing, which includes your signature, the third-party's name, and either the third-party's address or the third-party's account number at a custodian to which the transfer should be directed.
- You will authorize us in writing, either on the custodian's form or separately, to direct transfers to the thirdparty either on a specified schedule or from time to time.
- Your custodian will perform appropriate verification of the instruction, such as a signature review or other method to verify your authorization and will provide a transfer of funds notice to you promptly after each transfer.
- You have the ability to terminate or change the instruction to your custodian at any time.
- We have no authority or ability to designate or change the identity of the third-party, the address, or any other information about the third-party contained in your instruction.
- We will maintain records showing that the third-party is not a related party to our firm or our associated persons, and the third-party is not located at the same address as our firm or our associated persons.



• Your custodian will send you an initial written notice confirming the instruction and an annual written notice reconfirming the instruction.

Item 16: Investment Discretion

Financial Planning Services

Recommendations made under our financial planning services with regard to accounts for which we do not provide investment management services are provided on a non-discretionary basis. You are responsible for initiating any transactions necessary to implement our recommendations.

Investment Management Services

With our investment management services, you grant us discretionary authority to buy and sell securities in your accounts. This authority is established and agreed upon in the client service agreement. With this authority we can transact securities without obtaining approval or consent from you prior to effecting the transaction. However, these transactions are subject to the investment strategy we have established with you.

Item 17: Proxy Voting

We do not vote proxies for securities held in client accounts. Therefore, clients maintain exclusive responsibility for voting proxies and acting on corporate actions pertaining to the client's investment assets. The client shall instruct the custodian to forward to them copies of all proxies and shareholder communications relating to their investment assets. If the client would like our guidance on a proxy vote, they may contact us at (704) 705-8773 for an opinion, but the final decision is theirs.

Item 18: Financial Condition

We do not require or solicit prepayment of more than \$500 in fees per client six months or more in advance. Therefore, we are not required to include our balance sheet in this section. We do not have any financial condition reasonably likely to impair our ability to meet our contractual requirements to you. We have not been the subject of a bankruptcy petition at any time.

Item 19: State-Registered Adviser Information

Jim Charles and Sarah Charles are the principal owners of our firm. Their formal education and business background can be found on the accompanying Form ADV Part 2B ("Brochure Supplements").

Other than the advisory services described in this Brochure, our firm is not engaged in any other business activities and does not have any relationship or arrangement with any issuer of securities.

Neither our firm nor any of our personnel are compensated for advisory services with performance-based fees.

Neither our firm nor any of our personnel have been involved in any award resulting from an arbitration claim or civil, self-regulatory, or administrative proceeding.

Business Continuity Plan

How We Prepare for Disruptions

We have a Business Continuity Plan ("BCP") in place to ensure that we can continue to serve our clients in the event of a significant business disruption. Because disruptions can vary in severity and scope, our plan is designed to be flexible and adaptable. Below are key components of our BCP.



Data Protection and Recovery

- All critical client data is stored securely in cloud-based systems with real-time backup and encryption.
- We conduct periodic tests to ensure that our data recovery process is effective and up to date.

Communication During a Disruption

- If our office is inaccessible, our personnel are equipped to work remotely with secure access to client information.
- Clients can reach us through email, phone, or our website in case of a disruption.
- If we are unable to communicate through normal channels, we will provide updates via our website or social media.

Alternate Work Locations

- In the event of an office closure, SFP personnel will continue operations remotely from secure locations.
- Our financial planning tools and client records remain accessible to ensure seamless service.

Access to Your Funds and Accounts

- We do not hold client funds, meaning your assets remain safe with your custodian.
- If we are unreachable, clients should contact their custodian directly for transactions and account access.

Regulatory and Compliance Measures

- We comply with all regulatory requirements to protect client information and ensure business continuity.
- Our plan is reviewed and tested annually to stay current with evolving risks and best practices.

Responding to Different Levels of Disruptions

- If a local disruption affects only our office, we will continue business remotely.
- If a regional disruption occurs (such as a natural disaster), we will activate our full remote operations and ensure continuity.
- In extreme cases where we cannot continue business operations, we will coordinate with regulators and custodians to ensure client needs are met.

Contacting Us

If you are unable to reach us through normal channels, please try alternative contact methods listed on our website. If we are completely inaccessible, please reach out to your account custodian directly for assistance.

If you have any questions about our Business Continuity Plan, please contact us at (704) 705-8773.





Brochure Supplement Form ADV Part 2B

James Charles

Sanctuary Financial Planning, LLC

601 South Kings Drive, Suite F-155

Charlotte, NC 28204

(704) 705-8773

www.sanctuaryfp.com

July 17, 2025

Item 1: Cover Page

This Brochure Supplement provides information about Jim Charles that supplements the Firm Brochure of Sanctuary Financial Planning, LLC ("SFP"), CRD number 325857. A copy of that Brochure precedes this Supplement. Please contact Jim Charles if the SFP Brochure is not included with this Supplement or if you have any questions about the contents of this Supplement.

Additional information about Jim Charles is available on the SEC's website at <u>www.adviserinfo.sec.gov</u>, which can be found using his individual CRD number 1785950.

Item 2: Educational Background and Business Experience

Full Name: James ("Jim") Gregory Charles

CRD Number: 1785950

Born: 1956

Educational Background

- Georgia State University: Master of Science, Personal Financial Planning 1986
- **Ohio State University:** Bachelor of Science, Business Marketing 1978

Business Experience

- Sanctuary Financial Planning, LLC: Founder, Managing Principal, and Chief Compliance Officer 3/2023 to Present
- Dimensional Fund Advisors LP: Vice President and Regional Director, Co-Head, Institutional 8/2008 to 8/2021
- American Century Investments: Vice President and Client Portfolio Manager 11/1999 to 7/2008
- Watson Wyatt Investment Consulting (now Willis Towers Watson): Investment Consultant 5/1998 to 11/1999
- Towers Perrin (now Willis Towers Watson): Investment Consultant 1/1995 to 5/1998

Professional Designations

- Certified Divorce Financial Analyst[®] ("CDFA[®]") 2023
- Chartered Financial Analyst ("CFA®") 2001
- CERTIFIED FINANCIAL PLANNER[®] ("CFP[®]") 1987

Please see <u>Appendix</u> for definitions of the above.

Item 3: Disciplinary Information

Jim Charles has never been involved in an arbitration claim of any kind or been found liable in any criminal or civil actions, self-regulatory organization proceeding, administrative proceeding, or other hearings or formal adjudications.

Item 4: Other Business Activities

Jim Charles is not involved in any other business activities.

Item 5: Additional Compensation

As an owner of SFP, Jim Charles receives economic benefit from the overall profitability of the firm, but he does not receive any additional compensation from non-clients for providing advisory services.



Item 6: Supervision

Jim Charles, Chief Compliance Officer of SFP, is responsible for supervision. Supervision is administered through the application of and adherence to written policies and procedures, which include regular reviews of financial plans and investment portfolios and ongoing communication with clients to ensure advice aligns with the firm's policies and clients' objectives. He can be contacted at the phone number in Item 1 of this Brochure Supplement.

Item 7: Requirements for State-Registered Advisers

Jim Charles has never been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or bankruptcy petition.

Appendix

Certified Divorce Financial Analyst®

The Certified Divorce Financial Analyst ("CDFA®") is a professional designation awarded by the Institute for Divorce Financial Analysts ("IDFA®"). Individuals who hold the CDFA® designation have completed a course of study encompassing divorce laws and procedures; marital versus separate property; pensions and retirement plans; options for the marital home; fundamentals of child and spousal support; tax issues related to selling or transferring property; and debt, credit, and bankruptcy. Individuals must meet minimum educational and professional experience, in addition to passing an exam consisting of 150 multiple-choice questions. To assure continuing competency in tax codes, legislative, and other ongoing developments in the field of divorce financial planning, designation holders must report 30 hours of divorce-related continuing education every two years. For more information, refer to IDFA's website at: institutedfa.com/about-cdfa-course/.

CERTIFIED FINANCIAL PLANNER®

The CERTIFIED FINANCIAL PLANNER[®] ("CFP[®]") is a professional certification awarded by the Certified Financial Planner Board of Standards, Inc. ("CFP Board"). The CFP[®] certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP[®] certification. It is recognized for its high standards for education, examination, experience, and ethics.

To attain the right to use the CFP® certification, an individual must satisfactorily fulfill the following requirements:

- Education: Earn a bachelor's degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials. CFP Board implemented the bachelor's degree or higher requirement in 2007 and the financial planning development capstone course requirement in March 2012. Therefore, a CFP[®] professional who first became certified before those dates may not have earned a bachelor's or higher degree or completed a financial planning development capstone course.
- **Examination:** Pass the comprehensive CFP[®] Certification Examination. The examination is designed to assess an individual's ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- **Experience:** Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.



• Ethics: Satisfy the Fitness Standards for Candidates for CFP[®] Certification and Former CFP[®] Professionals Seeking Reinstatement and agree to be bound by CFP Board's *Code of Ethics and Standards of Conduct* ("*Code and Standards*"), which sets forth the ethical and practice standards for CFP[®] professionals.

Individuals who obtain the CFP[®] certification must also complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP[®] marks:

- Ethics: Annually reaffirm and commit to complying with the CFP Board's *Code and Standards*. This includes a commitment to the CFP Board to act as a fiduciary and to act in the best interests of the client at all times when providing financial advice and financial planning.
- **Continuing Education:** Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge and skills, and keep up with developments in financial planning. Two of the hours must be CFP Board-approved curriculum on ethics.

CFP[®] professionals who fail to comply with the above standards and requirements may be subject to the CFP Board's disciplinary process, which could result in suspension or permanent revocation of the CFP[®] certification. For more information, refer to the CFP Board's website at: <u>www.cfp.net</u>.

Chartered Financial Analyst

The Chartered Financial Analyst ("CFA[®]") is a professional certification granted by the CFA Institute. It is internationally recognized for its rigorous education and training requirements and its mission to promote and develop a high level of educational, ethical, and professional standards in the investment industry.

To become a CFA® charterholder, an individual must fulfill the following requirements:

- Pass three sequential, six-hour examinations.
- Have at least four years of qualified professional investment experience, a bachelor's degree, or a combination of professional and educational experience totaling four years.
- Join the CFA Institute as a member.
- Commit to abide by and annually reaffirm adherence to the CFA Institute's Code of Ethics and Standards of Professional Conduct.

The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning. The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession. For more information, refer to the CFA Institute's website at: <u>www.cfainstitute.org</u>.





Brochure Supplement Form ADV Part 2B

Sarah Charles

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July 17, 2025

Item 1: Cover Page

This Brochure Supplement provides information about Sarah Charles that supplements the Firm Brochure of Sanctuary Financial Planning, LLC ("SFP"), CRD number 325857. A copy of that Brochure precedes this Supplement. Please contact Jim Charles if the SFP Brochure is not included with this Supplement or if you have any questions about the contents of this Supplement.

Additional information about Sarah Charles is available on the SEC's website at <u>www.adviserinfo.sec.gov</u>, which can be found using her individual CRD number 5461219.

Item 2: Educational Background and Business Experience

Full Name: Sarah Karp Charles

CRD Number: 5461219

Born: 1975

Educational Background

• Duke University: Bachelor of Arts, Economics – 1997

Business Experience

- Sanctuary Financial Planning, LLC: Founder and Managing Principal 6/2023 to Present
- FORVIS Wealth Advisors LLC: Managing Director and Regional Leader Mid-Atlantic 6/2022 to 6/2023
- DHG Wealth Advisors: Director, Director of Business Strategy, and Leader of Charlotte Wealth Management Practice – 6/2020 to 6/2022
- DHG Wealth Advisors: Senior Advisor, Leader of Charlotte Wealth Management Practice 11/2011 to 6/2020
- Dixon Hughes Wealth Advisors LLC: Director of Marketing 11/2007 to 11/2011

Professional Designations

- Chartered Socially Responsible Investment CounselorSM ("CSRIC®") 2019
- Accredited Investment Fiduciary[®] ("AIF[®]") 2011

Please see <u>Appendix</u> for definitions of the above.

Item 3: Disciplinary Information

Sarah Charles has never been involved in an arbitration claim of any kind or been found liable in any criminal or civil actions, self-regulatory organization proceeding, administrative proceeding, or other hearings or formal adjudications.

Item 4: Other Business Activities

Sarah Charles is not involved any other business activities.

Item 5: Additional Compensation

As an owner of SFP, Sarah Charles receives economic benefit from the overall profitability of the firm, but she does not receive any additional compensation from non-clients for providing advisory services.

Item 6: Supervision

Jim Charles, as Chief Compliance Officer of SFP, is responsible for supervision. Supervision is administered through the application of and adherence to written policies and procedures, which include regular reviews of financial plans and investment portfolios and ongoing communication with clients to ensure advice aligns with the firm's policies and clients' objectives. He can be contacted at the phone number in <u>Item 1</u> of this Brochure Supplement.



Item 7: Requirements for State-Registered Advisers

Sarah Charles has never been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or bankruptcy petition.

Appendix

Accredited Investment Fiduciary®

The Accredited Investment Fiduciary[®] ("AIF[®]") is a professional designation awarded by Fi360, which is accredited by the American National Standards Institute ("ANSI") for the AIF[®] designation. Individuals who hold the AIF[®] designation have completed a course of study to assure that those responsible for managing or advising on investor assets have a fundamental understanding of the principles of fiduciary duty, the standards of conduct for acting as a fiduciary, and a process for carrying out fiduciary responsibility. Candidates must complete an approved course of training, pass the AIF[®] exam, meet experience requirements, and satisfy Code of Ethics and Conduct Standards requirements. For more information, refer to Fi360's website at: <u>www.fi360.com/what-we-do/learning-development/aif-training/aif-designation</u>.

Chartered Socially Responsible Investment CounselorSM

The Chartered Socially Responsible Investment CounselorSM ("CSRIC[®]") designation is recognized as the industrybenchmark for socially responsible investment ("SRI")-focused credentials. This program provides experienced financial advisors and investment professionals with a foundation knowledge of the history, definitions, trends, portfolio construction principles, fiduciary responsibilities, and best practices for sustainable, responsible, and impact SRI investments. The CSRIC[®] Professional Education Program is a three-semester credit graduate level course conferred by the College for Financial Planning[®] – a Kaplan Company. Authorization for continued use of the credential must be renewed every two years, by meeting the four renewal requirements:

- Complete 16 continuing education credits every two years;
- Comply with standards of professional conduct;
- Acknowledge terms and conditions statements for the rights to use the College for Financial Planning[®]'s marks; and
- Pay renewal fees.

For more information, refer to the College for Financial Planning[®]'s website at: <u>www.kaplanfinancial.com/wealth-</u><u>management/csric</u>.





Brochure Supplement Form ADV Part 2B

Alex Mathews

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July 17, 2025

Item 1: Cover Page

This Brochure Supplement provides information about Alex Mathews that supplements the Firm Brochure of Sanctuary Financial Planning, LLC ("SFP"), CRD number 325857. A copy of that Brochure precedes this Supplement. Please contact Jim Charles if the SFP Brochure is not included with this Supplement or if you have any questions about the contents of this Supplement.

Additional information about Alex Mathews is available on the SEC's website at <u>www.adviserinfo.sec.gov</u>, which can be found using his individual CRD number 8094622.



Item 2: Educational Background and Business Experience

Full Name: Alex Joseph Mathews

CRD Number: 8094622

Born: 1995

Educational Background

- Old Dominion University: Master of Science, Engineering Management 2024
- University of Missouri: Bachelor of Arts, History with a minor in Naval Science 2018

Business Experience

- Sanctuary Financial Planning, LLC: Investment Adviser Representative 5/2025 to Present
- United States Navy: Submarine Officer 5/2018 to 5/2025

Awards and Achievements

- Navy and Marine Corps Commendation Medal
- Navy and Marine Corps Achievement Medal

Item 3: Disciplinary Information

Alex Mathews has never been involved in an arbitration claim of any kind or been found liable in any criminal or civil actions, self-regulatory organization proceeding, administrative proceeding, or other hearings or formal adjudications.

Item 4: Other Business Activities

Alex Mathews is not involved in any other business activities.

Item 5: Additional Compensation

Alex Mathews does not receive any additional compensation from non-clients for providing advisory services.

Item 6: Supervision

Jim Charles, Chief Compliance Officer of SFP, is responsible for supervision. Supervision is administered through the application of and adherence to written policies and procedures, which include regular reviews of financial plans and investment portfolios and ongoing communication with clients to ensure advice aligns with the firm's policies and clients' objectives. He can be contacted at the phone number in <u>Item 1</u> of this Brochure Supplement.

Item 7: Requirements for State-Registered Advisers

Alex Mathews has never been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or bankruptcy petition.

