

Item 1 – Cover Page

Doucette Financial

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This brochure provides information about the qualifications and business practices of Doucette Financial. If you have any questions about the contents of this brochure, please contact us at 207-543-4011 ext. 800 or [r.doucette@doucettefinancial.com](mailto:r.doucette@doucettefinancial.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Doucette Financial is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

Item 2 – Material Changes

\*Annual % Rate update under Item 5.

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#### Item 4. Advisory Business

Doucette Financial was founded by Rick Doucette and started in 2025. Its main goal is to help clients develop and build a retirement portfolio. The physical office is based in Androscoggin County, Maine.

Client data gathered will be used to examine the client’s status in the development and planning for their retirement. By gathering such data as the level of acceptable risk, liquidity desire, and time horizon, investments provided to the client should fit their individual goals based upon provided information. Clients may impose restrictions when selecting investments based upon risk, liquidity, and a timeline for funds investment. These restrictions will be followed as guidelines to recommend the investment that both meets the restrictions and closely meets the goals of the individual.

Each client will have an Investment Advisor Representative who will complete an Investment Policy Statement that will be signed by the client.

The options of available offerings for client accounts include but are not limited to:

Exchange Listed Stocks (NYSE, AMEX); Nasdaq Listed Securities; ETFs; ETNs; Mutual Funds; American Depository Receipts (“ADRs”); Bonds (Government, Mortgage-backed, Municipal, Corporate); Exchanged Traded REITs.

The firm does not participate in a wrap fee program. Client’s assets will be managed on a non-discretionary basis while being held in a custodian account.

Doucette Financial has a fiduciary duty to provide services consistent with the Client’s best interest. Accounts will be monitored monthly to determine if changes are necessary based upon various factors such as but not limited to investment performance, market conditions, economic factors or changes in clients’ investment goals and objectives. There is no guarantee that investment decisions made by Doucette Financial will be profitable or equal a specific performance level.

Investment advisory services and financial advisory services are the two primary services that we offer.

#### Item 5. Fees & Compensation

Fees are billed in arrears for investment advisory services To facilitate billing we usually deduct fees from a designated client account or client can also pay by ach on Doucette Financial website. Clients must consent in advance to direct billing of their accounts. Fees are negotiable.

#### **Investment Services**

AUM	Annual % Rate
\$0-\$250,000	1.25%
\$250,001-\$500,000	1.20%

\$500,001-\$750,000	1.15%
\$750,001-\$1,000,000	1.10%
\$1,000,001 +	1.05%

#### Other Fees

Custodians may charge transaction fees on purchases or sales of certain mutual funds and exchange-traded funds. These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security. We include complete details regarding custodians in this brochure under Brokerage Practices.

#### Expense Ratios

Mutual funds and exchange-traded funds charge a management fee for their services as investment managers. The management fee is included in what is called an expense ratio. For example, an expense ratio of 0.30 means that the mutual fund company charges 0.3% for its services. Clients incur these fees indirectly in addition to the fees they pay directly to Doucette Financial. Mutual fund companies deduct their fees before calculating and quoting performance figures in various publications.

#### Past Due Accounts

We reserve the right to stop working on any account that is more than 30 days overdue.

#### Fee Refund Calculations

If a client terminates an ongoing investment management agreement, we will prorate fees for the portion of the billing month completed.

#### Refunds

Any refunds will be credited back to client account.

#### Billing Example

January charge for an account with \$1,000.00.

$$2\%/12 = .0016666\%$$

$$.0016666 * 1,000.00 = \$1.66$$

Client terminated agreement on the 16<sup>th</sup> of January.

January has 31 days.

$$\$1.66/31 = .05354$$

Monthly charge would be  $.05354 \times 16 = \$0.85$  instead of \$1.66.

\*Due to fees being billed in arrears if non-performance or termination of contract is completed before the next billing cycle, client's will not be charged their monthly fee.

Clients are responsible for all fees related to investments.

Clients may purchase ongoing investment services and use financial planning services on an as needed basis. Financial planning service is provided at no additional cost to investment management clients. There are two separate client agreements for these services. The agreements are the Client Investment Service agreement and the Client Financial Planning Service agreement. The investment service agreement is an ongoing agreement while the financial planning agreement will terminate at the end of service.

#### Financial Planning Services

Cost/hr
\$50

\*Billed on the quarter hour(\$12.50/15 minutes)

\*Rounded up to the next quarter hour.

\*First 50% of estimated cost is billed in advance while remaining 50% is billed in arrears.

\*Fees are negotiable.

Fees may be paid by ach debit from client's bank account or if client is also an investment advisory client, they can elect to have them taken directly from the investment account. Fees will be collected on a biweekly basis until paid in full.

\*Client has the right to terminate the contract without penalty within 5 days after entering into a contract.

Refunds due to non-performance or termination before billing cycle.

-Client will be refunded complete amount that has been collected in prior billing cycle upon next billing cycle which is bi-weekly.

#### Cash & Debt Management

- Budget/Cash Flow Analysis

- Debt Payoff Planning

- Emergency Fund Planning
- Establishing & Managing Savings Plans
- Interest Rate Evaluations
- Student Loan Debt Analysis, Strategy and Forgiveness

- Financing Decisions (Education, Home Purchase, etc...)
- Lease vs. Buy Analysis
- Credit Analysis (Establishing & Improving Credit)
- Behavioral Coaching & Establishing Healthy Foundation

#### Retirement & Financial Goal Planning

- Retirement Goal-Based planning
  - Retirement Income Planning
  - Social Security Planning & Strategy
- Annuity & Guaranteed Income Planning
  - Education Goal-Based Planning
- Large Purchase Goal-Based Planning
- Coordination of Employer Retirement Benefits
  - Legacy Goal-Based Planning
  - Small Business Retirement Plans
  - Sole Proprietor Retirement Plans
    - Employer Stock Plans
    - Planning for a Family

#### Asset Allocation & Investment Planning

- Risk Tolerance Measurement
  - Risk Tolerance Monitoring
- Asset Allocation Analysis & Coordination with Goals/Risk
- Analysis of Held Away Accounts & Employer Retirement Plans
  - Investment Cost Analysis
- Tax Loss & Gain Harvesting Analysis
- Tax Efficient Investment Planning
  - Concentrated Stock Analysis
  - Annuity Review and Analysis
- ESG (Socially Responsible) Investment Planning

#### Item 6. Performance Based Fees and Side-by-Side Management

These fees are not charged by Doucette Financial.

#### Item 7. Types of Clients

Doucette Financial is open to any client interested in our services. We do mainly focus on individual clients. There are no requirements for opening an account.

#### Item 8. Methods of Analysis, Investment Strategies & Risk of Loss

Investing in securities involves the risk of loss that clients should be prepared to bear.

Doucette Financial's methods of security analysis includes, without limitation, charting, fundamental analysis, technical analysis, and economic analysis. The main sources of information will be industry research, reports purchased from research companies, publicly available data, annual reports, quarterly reports and other filings filed with the SEC. The investments strategies used to implement recommendations will be long-term purchases (held at least a year), short-term purchases (held less than a year), and trading (holding for a month or less), limit pricing, and stop losses.

#### Risk of Loss

It's Important to understand that all Investments carry some level of risk.

Stocks (Equities):

- **Market Risk:** The overall stock market can fluctuate due to economic conditions, political events, and investor sentiment.
- **Company-Specific Risk:** Individual companies can underperform due to poor management, competition, or industry changes.
- **Volatility Risk:** Stock prices can experience significant and rapid fluctuations.
- **Liquidity Risk:** Some stocks, particularly those of smaller companies, may be difficult to buy or sell quickly.

Bonds (Fixed Income):

- **Interest Rate Risk:** Bond prices move inversely to interest rates. When interest rates rise, bond prices typically fall.
- **Credit Risk (Default Risk):** The issuer of the bond may default on its debt obligations.
- **Inflation Risk:** Inflation can erode the purchasing power of bond returns.
- **Liquidity Risk:** Some bonds may be difficult to sell before maturity.
- **Reinvestment Risk:** The risk that future reinvestment of coupon payments will be at a lower interest rate than the original bond.

Mutual Funds:

- **Market Risk:** Mutual funds are subject to the risks of the underlying assets they hold (stocks, bonds, etc.).
- **Management Risk:** The fund's performance depends on the skill of the fund manager.

- Expense Risk: Mutual funds charge fees, which can reduce returns.
- Specific Fund Risk: Depending on the type of fund, there can be very specific risks. For example, international funds have currency risk.

#### American Depositary Receipts (ADRs):

- Currency Risk: ADRs represent foreign stocks, so their value can be affected by fluctuations in exchange rates.
- Political Risk: Political instability in the foreign country can impact the value of the underlying stock.
- Economic Risk: Economic conditions in the foreign country can affect company performance.
- Information Risk: Foreign companies may have different reporting standards, making it harder to assess their financial health.
- Liquidity Risk: Depending on the ADR, liquidity may be less than that of US stocks.

#### Exchange-Traded Funds (ETFs):

- Market Risk: ETFs are subject to the risks of the underlying assets they track.
- Tracking Error: An ETF may not perfectly track its underlying index.
- Liquidity Risk: While most ETFs are liquid, some may have low trading volumes.
- Specific ETF Risk: just like mutual funds, the risk of the etf is highly dependent on the type of assets it holds.

#### Exchange-Traded Notes (ETNs):

- Credit Risk: ETNs are debt securities, so they carry the credit risk of the issuing bank.
- Market Risk: ETNs are linked to market indexes, so they are subject to market fluctuations.
- Complexity Risk: ETNs can be complex financial instruments, making them difficult to understand.
- Liquidity Risk: ETN liquidity can vary.

#### Exchange-Traded REITs (Real Estate Investment Trusts):

- Real Estate Market Risk: REITs are affected by fluctuations in the real estate market.
- Interest Rate Risk: Rising interest rates can increase borrowing costs for REITs and reduce their profitability.
- Property-Specific Risk: The performance of a REIT can be affected by the condition and occupancy of its properties.
- Liquidity Risk: While exchange traded, REITs can still have liquidity issues, especially during market downturns.

Any investment involves the risk of loss that clients should be prepared to bear. As the client's goals, objectives, and risk tolerance change, it is the client's obligation to update the Investment Advisor Representative to update the Investment Policy Statement as well as update the investment strategies as needed.

#### Item 9. Disciplinary Information

Licensed investment advisers are required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of its advisory business or the integrity of its management. Doucette Financial and its management personnel have no reportable disciplinary events to disclose.

#### Item 10. Other Financial Industry Activities and Affiliations

Doucette Financial does not currently have any other financial industry activities or affiliations.

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

Doucette Financial has adopted a code of ethics which seeks to honor the utmost principals of fiduciary responsibility or a licensed financial advisor. Our code of ethics seeks to ensure that employee personal investment does not interfere with, or bias client recommendations. Recommendations are monitored on a random basis to ensure that these policies are being followed.

Doucette Financial and its Supervised Persons are exposed to potential conflicts of interest; the code of ethics contains provisions designed to mitigate certain of these potential conflicts, by governing and reviewing the personal securities transactions of certain of its Supervised Persons known as Access Persons (as defined in the Advisers Act).

Access Persons' trades must be executed in a manner consistent with the following principles: (i) the interests of client accounts will at all times be placed first; (ii) all personal securities transactions will be conducted in such manner as to avoid any actual or potential conflict of interest or any abuse of an individual's position of trust and responsibility; and (ii) Access Persons must not take inappropriate advantage of their positions.

The code of ethics does not prevent or prohibit Access Persons from trading in securities that Doucette Financial recommends, or in which Doucette Financial invests client assets. Rather, it prescribes the principles that must govern all Access Persons' personal trading activities as described above. As such, it is possible that (i) Doucette Financial and its Advisors could recommend to clients, or buy or sell for client accounts, securities in which one or more Access Persons or Doucette Financial has a material financial interest, (ii) Access Persons or Doucette Financial could invest in the same securities (or related securities) that it or its Advisors recommends to clients, or (iii) it or its Advisors, could recommend securities to clients, or buy or sell securities for client accounts, at or about the same time that one or more Access Persons buys or sells the same securities for their own account. This presents a potential

conflict in that the Access Person might seek to benefit himself or herself from this type of trading activity in the same securities, either by trading for personal accounts in advance of client trading activity, or otherwise. These types of potential conflicts are precisely why Doucette Financial has articulated clear principles regarding such conduct and has required the submission of regular reports regarding personal securities transactions of its Access Persons. As noted above, conduct that is contrary to the company's code of ethics subjects the Access Person to possible sanctions including, in appropriate cases, termination of employment.

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

#### Item 12. Brokerage Practices

Doucette Financial has a custodian relationship with Altruist, which is where we will recommend that funds are deposited to be invested. Clients can always choose their own custodian or brokerage as well. Recommendations are based on client needs, the reputation of the brokerage, and the services they offer.

#### Item 13. Review of Accounts

Accounts will be reviewed monthly by Rick Doucette. Clients will also need to advise their advisor of any changes in their financial situation or plan which will affect their investment recommendations.

Client accounts can request an additional review at any time based upon market conditions, updated financial information, and also new investment goals.

Annual reports are prepared that are separate from custodian quarterly reports. These reports may contain a net worth statement, portfolio statement, and other related items pertinent to each individual client.

Reports, when provided, will be provided electronically, in paper format or presented in face-to-face meetings.

#### Item 14. Client Referrals

Doucette Financial may pay referral fees to independent promoters for client referrals. The promoter is required to provide the firm brochure and a separate brochure that provides the promoter's name, a statement informing the client the promoter is receiving a referral fee, the amount of the fee, and whether the fee paid to the promoter will increase the cost to the client.

The referral fee will not increase the client's costs.

#### Item 15. Custody

Doucette Financial has limited custody of client funds due to fees being deducted directly from client accounts custodied with a qualified custodian.

Custody of client funds will be held by our recommended custodian Altruist or another broker which is chosen by the client.

#### Item 16. Investment Discretion

Doucette Financial only has non-discretionary authority over client accounts. Written or verbal permission will be needed for each trade made on a client's account.

#### Item 17. Voting Client Securities

Doucette Financial does not vote on client securities. We may advise the client on instructions which will enable them to vote but will not advise how they should vote.

#### Item 18. Financial Information

Licensed Investment Advisers are required to disclose financial information which may impair them from conducting business. Doucette Financial has no financial commitments that would obstruct it from conducting business. There is no requirement for prepayment of fees of \$500 in fees per client, six months or more in advance so the firm is not required to disclose a balance sheet.

#### Item 19. Requirements for State-Licensed Advisers

Rick Doucette founded Doucette Financial in 2025 after graduating from the University of Southern Maine with a bachelor's degree in finance. He has been in the finance industry since 2018.

#### Item 20. Privacy Notice

Regulation S-P requires that financial institutions provide privacy notices in various instances and to adopt policies and procedures to protect the personal information of its consumers and customers. This statement describes our privacy policy and how we handle your personal information.

We are Committed to Protecting Your Privacy.

We respect every individual's right to privacy. We understand the importance you place on the privacy and security of information that personally identifies you or your account information.

#### Why and How We Collect Personal Information.

We collect personal information about you for the purpose of providing investment advisory services to you, evaluating your financial needs, processing your requests and transactions and providing customer service. The personal information we collect about you may include:

- Information we receive from you to open an account or provide investment advice to you, such as your home address, telephone number and financial information.
- Information that we generate to service your account, such as account statements; and Information that we may receive from third parties with respect to your account, such as trade confirmations with brokerage firms.
- Identifiable information, stored in the form of cookies on your computer, relating to your access and use of any of our websites.

We do not sell personal information to anyone.

We disclose personal information only as required by law or with your permission.