Form 5500

Department of the Treasury
Internal Revenue Service

Department of Labor
Employee Benefits Security Administration

Pension Benefit Guaranty Corporation

Annual Return/Report of Employee Benefit Plan

This form is required to be filed for employee benefit plans under sections 104 and 4065 of the Employee Retirement Income Security Act of 1974 (ERISA) and sections 6057(b) and 6058(a) of the Internal Revenue Code (the Code).

▶ **Complete all entries in accordance with the instructions to the Form 5500.**

OMB Nos. 1210-0110
1210-0089

2018

This Form is Open to Public Inspection

Part I Annual Report Identification Information

For calendar plan year 2018 or fiscal plan year beginning 10/01/2018 and ending 09/30/2019

A This return/report is for:
- [ ] a multiemployer plan
- [ ] a multiple-employer plan (Filers checking this box must attach a list of participating employer information in accordance with the form instructions.)
- [X] a single-employer plan
- [ ] a DFE (specify) ____

B This return/report is:
- [ ] the first return/report
- [ ] the final return/report
- [ ] an amended return/report
- [ ] a short plan year return/report (less than 12 months)

C If the plan is a collectively-bargained plan, check here. . . . . ▶ [ ]

D Check box if filing under:
- [X] Form 5558
- [ ] automatic extension
- [ ] the DFVC program
- [ ] special extension (enter description)

Part II Basic Plan Information—enter all requested information

1a Name of plan
FIRST COMMAND FINANCIAL PLANNING, INC. 401(K)-EMPLOYEE STOCK OWNERSHIP PLAN

1b Three-digit plan number (PN) ▶ 001

1c Effective date of plan 11/05/1964

2a Plan sponsor's name (employer, if for a single-employer plan)
Mailing address (include room, apt., suite no. and street, or P.O. Box)
City or town, state or province, country, and ZIP or foreign postal code (if foreign, see instructions)
FIRST COMMAND FINANCIAL PLANNING, INC.

1 FIRSTCOMM PLAZA
FORT WORTH, TX 76109-4978

2b Employer Identification Number (EIN) 75-1054341

2c Plan Sponsor's telephone number 817-569-2344

2d Business code (see instructions) 523120

Caution: A penalty for the late or incomplete filing of this return/report will be assessed unless reasonable cause is established.

Under penalties of perjury and other penalties set forth in the instructions, I declare that I have examined this return/report, including accompanying schedules, statements and attachments, as well as the electronic version of this return/report, and to the best of my knowledge and belief, it is true, correct, and complete.

SIGN HERE	Filed with authorized/valid electronic signature.	07/15/2020	HEIDI CERBONE
	Signature of plan administrator	Date	Enter name of individual signing as plan administrator
SIGN HERE	Filed with authorized/valid electronic signature.	07/15/2020	HEIDI CERBONE
	Signature of employer/plan sponsor	Date	Enter name of individual signing as employer or plan sponsor
SIGN HERE			
	Signature of DFE	Date	Enter name of individual signing as DFE

3a Plan administrator's name and address [X] Same as Plan Sponsor

3b Administrator's EIN

3c Administrator's telephone number

4 If the name and/or EIN of the plan sponsor or the plan name has changed since the last return/report filed for this plan, enter the plan sponsor's name, EIN, the plan name and the plan number from the last return/report:
a Sponsor's name
c Plan Name

4b EIN

4d PN

5 Total number of participants at the beginning of the plan year	**5**	863
6 Number of participants as of the end of the plan year unless otherwise stated (welfare plans complete only lines **6a(1), 6a(2), 6b, 6c,** and **6d**).		
a(1) Total number of active participants at the beginning of the plan year	**6a(1)**	720
a(2) Total number of active participants at the end of the plan year	**6a(2)**	745
b Retired or separated participants receiving benefits	**6b**	1
c Other retired or separated participants entitled to future benefits	**6c**	159
d Subtotal. Add lines **6a(2)**, **6b**, and **6c**	**6d**	905
e Deceased participants whose beneficiaries are receiving or are entitled to receive benefits.	**6e**	0
f Total. Add lines **6d** and **6e**.	**6f**	905
g Number of participants with account balances as of the end of the plan year (only defined contribution plans complete this item)	**6g**	882
h Number of participants who terminated employment during the plan year with accrued benefits that were less than 100% vested	**6h**	25
7 Enter the total number of employers obligated to contribute to the plan (only multiemployer plans complete this item)	**7**	

8a If the plan provides pension benefits, enter the applicable pension feature codes from the List of Plan Characteristics Codes in the instructions:

2E 2F 2G 2I 2J 2O 2P 2Q 2S 2T 3H 3I

b If the plan provides welfare benefits, enter the applicable welfare feature codes from the List of Plan Characteristics Codes in the instructions:

9a Plan funding arrangement (check all that apply)

(1)	[ ]	Insurance
(2)	[ ]	Code section 412(e)(3) insurance contracts
(3)	[X]	Trust
(4)	[ ]	General assets of the sponsor

9b Plan benefit arrangement (check all that apply)

(1)	[ ]	Insurance
(2)	[ ]	Code section 412(e)(3) insurance contracts
(3)	[X]	Trust
(4)	[ ]	General assets of the sponsor

10 Check all applicable boxes in 10a and 10b to indicate which schedules are attached, and, where indicated, enter the number attached. (See instructions)

a Pension Schedules

(1)	[X]	**R** (Retirement Plan Information)
(2)	[ ]	**MB** (Multiemployer Defined Benefit Plan and Certain Money Purchase Plan Actuarial Information) - signed by the plan actuary
(3)	[ ]	**SB** (Single-Employer Defined Benefit Plan Actuarial Information) - signed by the plan actuary

b General Schedules

(1)	[X]	**H** (Financial Information)
(2)	[ ]	**I** (Financial Information – Small Plan)
(3)	[ ]	**A** (Insurance Information)
(4)	[X]	**C** (Service Provider Information)
(5)	[X]	**D** (DFE/Participating Plan Information)
(6)	[ ]	**G** (Financial Transaction Schedules)

Part III Form M-1 Compliance Information (to be completed by welfare benefit plans)

11a If the plan provides welfare benefits, was the plan subject to the Form M-1 filing requirements during the plan year? (See instructions and 29 CFR 2520.101-2.) ..... ☐ Yes ☐ No

If "Yes" is checked, complete lines 11b and 11c.

11b Is the plan currently in compliance with the Form M-1 filing requirements? (See instructions and 29 CFR 2520.101-2.) ..... ☐ Yes ☐ No

11c Enter the Receipt Confirmation Code for the 2018 Form M-1 annual report. If the plan was not required to file the 2018 Form M-1 annual report, enter the Receipt Confirmation Code for the most recent Form M-1 that was required to be filed under the Form M-1 filing requirements. (Failure to enter a valid Receipt Confirmation Code will subject the Form 5500 filing to rejection as incomplete.)

Receipt Confirmation Code_____

SCHEDULE C (Form 5500)	Service Provider Information	OMB No. 1210-0110
Department of the Treasury Internal Revenue Service Department of Labor Employee Benefits Security Administration Pension Benefit Guaranty Corporation	This schedule is required to be filed under section 104 of the Employee Retirement Income Security Act of 1974 (ERISA). ▶ **File as an attachment to Form 5500.**	**2018** **This Form is Open to Public Inspection.**

For calendar plan year 2018 or fiscal plan year beginning 10/01/2018 and ending 09/30/2019

A Name of plan
FIRST COMMAND FINANCIAL PLANNING, INC. 401(K)-EMPLOYEE STOCK OWNERSHIP PLAN

B Three-digit plan number (PN) ▶ 001

C Plan sponsor's name as shown on line 2a of Form 5500
FIRST COMMAND FINANCIAL PLANNING, INC.

D Employer Identification Number (EIN)
75-1054341

Part I Service Provider Information (see instructions)

You must complete this Part, in accordance with the instructions, to report the information required for **each person** who received, directly or indirectly, $5,000 or more in total compensation (i.e., money or anything else of monetary value) in connection with services rendered to the plan or the person's position with the plan during the plan year. If a person received **only** eligible indirect compensation for which the plan received the required disclosures, you are required to answer line 1 but are not required to include that person when completing the remainder of this Part.

1 Information on Persons Receiving Only Eligible Indirect Compensation

a Check "Yes" or "No" to indicate whether you are excluding a person from the remainder of this Part because they received only eligible indirect compensation for which the plan received the required disclosures (see instructions for definitions and conditions). . . . . [X] Yes [ ] No

b If you answered line 1a "Yes," enter the name and EIN or address of each person providing the required disclosures for the service providers who received only eligible indirect compensation. Complete as many entries as needed (see instructions).

(b) Enter name and EIN or address of person who provided you disclosures on eligible indirect compensation

PRINCIPAL LIFE INSURANCE COMPANY

42-0127290

(b) Enter name and EIN or address of person who provided you disclosures on eligible indirect compensation

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(b) Enter name and EIN or address of person who provided you disclosures on eligible indirect compensation

2. Information on Other Service Providers Receiving Direct or Indirect Compensation. Except for those persons for whom you answered "Yes" to line 1a above, complete as many entries as needed to list each person receiving, directly or indirectly, $5,000 or more in total compensation (i.e., money or anything else of value) in connection with services rendered to the plan or their position with the plan during the plan year. (See instructions).

(a) Enter name and EIN or address (see instructions)

PRINCIPAL LIFE INSURANCE COMPANY

42-0127290

(b) Service Code(s)	(c) Relationship to employer, employee organization, or person known to be a party-in-interest	(d) Enter direct compensation paid by the plan. If none, enter -0-.	(e) Did service provider receive indirect compensation? (sources other than plan or plan sponsor)	(f) Did indirect compensation include eligible indirect compensation, for which the plan received the required disclosures?	(g) Enter total indirect compensation received by service provider excluding eligible indirect compensation for which you answered "Yes" to element (f). If none, enter -0-.	(h) Did the service provider give you a formula instead of an amount or estimated amount?
13 37 50 64	CONTRACT ADMINISTRATOR	105820	Yes [X] No [ ]	Yes [X] No [ ]	0	Yes [ ] No [X]

(a) Enter name and EIN or address (see instructions)

(b) Service Code(s)	(c) Relationship to employer, employee organization, or person known to be a party-in-interest	(d) Enter direct compensation paid by the plan. If none, enter -0-.	(e) Did service provider receive indirect compensation? (sources other than plan or plan sponsor)	(f) Did indirect compensation include eligible indirect compensation, for which the plan received the required disclosures?	(g) Enter total indirect compensation received by service provider excluding eligible indirect compensation for which you answered "Yes" to element (f). If none, enter -0-.	(h) Did the service provider give you a formula instead of an amount or estimated amount?
			Yes [ ] No [ ]	Yes [ ] No [ ]		Yes [ ] No [ ]

(a) Enter name and EIN or address (see instructions)

(b) Service Code(s)	(c) Relationship to employer, employee organization, or person known to be a party-in-interest	(d) Enter direct compensation paid by the plan. If none, enter -0-.	(e) Did service provider receive indirect compensation? (sources other than plan or plan sponsor)	(f) Did indirect compensation include eligible indirect compensation, for which the plan received the required disclosures?	(g) Enter total indirect compensation received by service provider excluding eligible indirect compensation for which you answered "Yes" to element (f). If none, enter -0-.	(h) Did the service provider give you a formula instead of an amount or estimated amount?
			Yes [ ] No [ ]	Yes [ ] No [ ]		Yes [ ] No [ ]

2. Information on Other Service Providers Receiving Direct or Indirect Compensation. Except for those persons for whom you answered "Yes" to line 1a above, complete as many entries as needed to list each person receiving, directly or indirectly, $5,000 or more in total compensation (i.e., money or anything else of value) in connection with services rendered to the plan or their position with the plan during the plan year. (See instructions).

(a) Enter name and EIN or address (see instructions)

(b) Service Code(s)	**(c)** Relationship to employer, employee organization, or person known to be a party-in-interest	**(d)** Enter direct compensation paid by the plan. If none, enter -0-.	**(e)** Did service provider receive indirect compensation? (sources other than plan or plan sponsor)	**(f)** Did indirect compensation include eligible indirect compensation, for which the plan received the required disclosures?	**(g)** Enter total indirect compensation received by service provider excluding eligible indirect compensation for which you answered "Yes" to element (f). If none, enter -0-.	**(h)** Did the service provider give you a formula instead of an amount or estimated amount?
			Yes ☐ No ☐	Yes ☐ No ☐		Yes ☐ No ☐

(a) Enter name and EIN or address (see instructions)

(b) Service Code(s)	**(c)** Relationship to employer, employee organization, or person known to be a party-in-interest	**(d)** Enter direct compensation paid by the plan. If none, enter -0-.	**(e)** Did service provider receive indirect compensation? (sources other than plan or plan sponsor)	**(f)** Did indirect compensation include eligible indirect compensation, for which the plan received the required disclosures?	**(g)** Enter total indirect compensation received by service provider excluding eligible indirect compensation for which you answered "Yes" to element (f). If none, enter -0-.	**(h)** Did the service provider give you a formula instead of an amount or estimated amount?
			Yes ☐ No ☐	Yes ☐ No ☐		Yes ☐ No ☐

(a) Enter name and EIN or address (see instructions)

(b) Service Code(s)	**(c)** Relationship to employer, employee organization, or person known to be a party-in-interest	**(d)** Enter direct compensation paid by the plan. If none, enter -0-.	**(e)** Did service provider receive indirect compensation? (sources other than plan or plan sponsor)	**(f)** Did indirect compensation include eligible indirect compensation, for which the plan received the required disclosures?	**(g)** Enter total indirect compensation received by service provider excluding eligible indirect compensation for which you answered "Yes" to element (f). If none, enter -0-.	**(h)** Did the service provider give you a formula instead of an amount or estimated amount?
			Yes ☐ No ☐	Yes ☐ No ☐		Yes ☐ No ☐

Part I Service Provider Information (continued)

3. If you reported on line 2 receipt of indirect compensation, other than eligible indirect compensation, by a service provider, and the service provider is a fiduciary or provides contract administrator, consulting, custodial, investment advisory, investment management, broker, or recordkeeping services, answer the following questions for (a) each source from whom the service provider received $1,000 or more in indirect compensation and (b) each source for whom the service provider gave you a formula used to determine the indirect compensation instead of an amount or estimated amount of the indirect compensation. Complete as many entries as needed to report the required information for each source.

(a) Enter service provider name as it appears on line 2	**(b)** Service Codes (see instructions)	**(c)** Enter amount of indirect compensation
(d) Enter name and EIN (address) of source of indirect compensation	**(e)** Describe the indirect compensation, including any formula used to determine the service provider's eligibility for or the amount of the indirect compensation.	

(a) Enter service provider name as it appears on line 2	**(b)** Service Codes (see instructions)	**(c)** Enter amount of indirect compensation
(d) Enter name and EIN (address) of source of indirect compensation	**(e)** Describe the indirect compensation, including any formula used to determine the service provider's eligibility for or the amount of the indirect compensation.	

(a) Enter service provider name as it appears on line 2	**(b)** Service Codes (see instructions)	**(c)** Enter amount of indirect compensation
(d) Enter name and EIN (address) of source of indirect compensation	**(e)** Describe the indirect compensation, including any formula used to determine the service provider's eligibility for or the amount of the indirect compensation.	

Part II Service Providers Who Fail or Refuse to Provide Information

4 Provide, to the extent possible, the following information for each service provider who failed or refused to provide the information necessary to complete this Schedule.

(a) Enter name and EIN or address of service provider (see instructions)	**(b)** Nature of Service Code(s)	**(c)** Describe the information that the service provider failed or refused to provide

(a) Enter name and EIN or address of service provider (see instructions)	**(b)** Nature of Service Code(s)	**(c)** Describe the information that the service provider failed or refused to provide

(a) Enter name and EIN or address of service provider (see instructions)	**(b)** Nature of Service Code(s)	**(c)** Describe the information that the service provider failed or refused to provide

(a) Enter name and EIN or address of service provider (see instructions)	**(b)** Nature of Service Code(s)	**(c)** Describe the information that the service provider failed or refused to provide

(a) Enter name and EIN or address of service provider (see instructions)	**(b)** Nature of Service Code(s)	**(c)** Describe the information that the service provider failed or refused to provide

(a) Enter name and EIN or address of service provider (see instructions)	**(b)** Nature of Service Code(s)	**(c)** Describe the information that the service provider failed or refused to provide

Part III Termination Information on Accountants and Enrolled Actuaries (see instructions)

(complete as many entries as needed)

a Name:	**b** EIN:
c Position:	
d Address:	**e** Telephone:

Explanation:

a Name:	**b** EIN:
c Position:	
d Address:	**e** Telephone:

Explanation:

a Name:	**b** EIN:
c Position:	
d Address:	**e** Telephone:

Explanation:

a Name:	**b** EIN:
c Position:	
d Address:	**e** Telephone:

Explanation:

a Name:	**b** EIN:
c Position:	
d Address:	**e** Telephone:

Explanation:

SCHEDULE D (Form 5500)

Department of the Treasury
Internal Revenue Service

Department of Labor
Employee Benefits Security Administration

DFE/Participating Plan Information

This schedule is required to be filed under section 104 of the Employee Retirement Income Security Act of 1974 (ERISA).

▶ **File as an attachment to Form 5500.**

OMB No. 1210-0110

2018

This Form is Open to Public Inspection.

For calendar plan year 2018 or fiscal plan year beginning 10/01/2018 and ending 09/30/2019

A Name of plan
FIRST COMMAND FINANCIAL PLANNING, INC. 401(K)-EMPLOYEE STOCK OWNERSHIP PLAN

B Three-digit plan number (PN) ▶ 001

C Plan or DFE sponsor's name as shown on line 2a of Form 5500
FIRST COMMAND FINANCIAL PLANNING, INC.

D Employer Identification Number (EIN)
75-1054341

Part I **Information on interests in MTIAs, CCTs, PSAs, and 103-12 IEs (to be completed by plans and DFEs)**
(Complete as many entries as needed to report all interests in DFEs)

a Name of MTIA, CCT, PSA, or 103-12 IE: MORLEY STABLE VALUE FUND

b Name of sponsor of entity listed in (a): PRINCIPAL GLOBAL INVESTORS TRUST CO

c EIN-PN	**d** Entity code	**e** Dollar value of interest in MTIA, CCT, PSA, or 103-12 IE at end of year (see instructions)
93-6274329-001	C	289298

a Name of MTIA, CCT, PSA, or 103-12 IE:

b Name of sponsor of entity listed in (a):

c EIN-PN	**d** Entity code	**e** Dollar value of interest in MTIA, CCT, PSA, or 103-12 IE at end of year (see instructions)

a Name of MTIA, CCT, PSA, or 103-12 IE:

b Name of sponsor of entity listed in (a):

c EIN-PN	**d** Entity code	**e** Dollar value of interest in MTIA, CCT, PSA, or 103-12 IE at end of year (see instructions)

a Name of MTIA, CCT, PSA, or 103-12 IE:

b Name of sponsor of entity listed in (a):

c EIN-PN	**d** Entity code	**e** Dollar value of interest in MTIA, CCT, PSA, or 103-12 IE at end of year (see instructions)

a Name of MTIA, CCT, PSA, or 103-12 IE:

b Name of sponsor of entity listed in (a):

c EIN-PN	**d** Entity code	**e** Dollar value of interest in MTIA, CCT, PSA, or 103-12 IE at end of year (see instructions)

a Name of MTIA, CCT, PSA, or 103-12 IE:

b Name of sponsor of entity listed in (a):

c EIN-PN	**d** Entity code	**e** Dollar value of interest in MTIA, CCT, PSA, or 103-12 IE at end of year (see instructions)

a Name of MTIA, CCT, PSA, or 103-12 IE:

b Name of sponsor of entity listed in (a):

c EIN-PN	**d** Entity code	**e** Dollar value of interest in MTIA, CCT, PSA, or 103-12 IE at end of year (see instructions)

a Name of MTIA, CCT, PSA, or 103-12 IE:

b Name of sponsor of entity listed in (a):

c EIN-PN	**d** Entity code	**e** Dollar value of interest in MTIA, CCT, PSA, or 103-12 IE at end of year (see instructions)

a Name of MTIA, CCT, PSA, or 103-12 IE:

b Name of sponsor of entity listed in (a):

c EIN-PN	**d** Entity code	**e** Dollar value of interest in MTIA, CCT, PSA, or 103-12 IE at end of year (see instructions)

a Name of MTIA, CCT, PSA, or 103-12 IE:

b Name of sponsor of entity listed in (a):

c EIN-PN	**d** Entity code	**e** Dollar value of interest in MTIA, CCT, PSA, or 103-12 IE at end of year (see instructions)

a Name of MTIA, CCT, PSA, or 103-12 IE:

b Name of sponsor of entity listed in (a):

c EIN-PN	**d** Entity code	**e** Dollar value of interest in MTIA, CCT, PSA, or 103-12 IE at end of year (see instructions)

a Name of MTIA, CCT, PSA, or 103-12 IE:

b Name of sponsor of entity listed in (a):

c EIN-PN	**d** Entity code	**e** Dollar value of interest in MTIA, CCT, PSA, or 103-12 IE at end of year (see instructions)

a Name of MTIA, CCT, PSA, or 103-12 IE:

b Name of sponsor of entity listed in (a):

c EIN-PN	**d** Entity code	**e** Dollar value of interest in MTIA, CCT, PSA, or 103-12 IE at end of year (see instructions)

a Name of MTIA, CCT, PSA, or 103-12 IE:

b Name of sponsor of entity listed in (a):

c EIN-PN	**d** Entity code	**e** Dollar value of interest in MTIA, CCT, PSA, or 103-12 IE at end of year (see instructions)

a Name of MTIA, CCT, PSA, or 103-12 IE:

b Name of sponsor of entity listed in (a):

c EIN-PN	**d** Entity code	**e** Dollar value of interest in MTIA, CCT, PSA, or 103-12 IE at end of year (see instructions)

a Name of MTIA, CCT, PSA, or 103-12 IE:

b Name of sponsor of entity listed in (a):

c EIN-PN	**d** Entity code	**e** Dollar value of interest in MTIA, CCT, PSA, or 103-12 IE at end of year (see instructions)

a Name of MTIA, CCT, PSA, or 103-12 IE:

b Name of sponsor of entity listed in (a):

c EIN-PN	**d** Entity code	**e** Dollar value of interest in MTIA, CCT, PSA, or 103-12 IE at end of year (see instructions)

Part II Information on Participating Plans (to be completed by DFEs)

(Complete as many entries as needed to report all participating plans)

a Plan name	
b Name of plan sponsor	**c** EIN-PN

a Plan name	
b Name of plan sponsor	**c** EIN-PN

a Plan name	
b Name of plan sponsor	**c** EIN-PN

a Plan name	
b Name of plan sponsor	**c** EIN-PN

a Plan name	
b Name of plan sponsor	**c** EIN-PN

a Plan name	
b Name of plan sponsor	**c** EIN-PN

a Plan name	
b Name of plan sponsor	**c** EIN-PN

a Plan name	
b Name of plan sponsor	**c** EIN-PN

a Plan name	
b Name of plan sponsor	**c** EIN-PN

a Plan name	
b Name of plan sponsor	**c** EIN-PN

a Plan name	
b Name of plan sponsor	**c** EIN-PN

a Plan name	
b Name of plan sponsor	**c** EIN-PN

SCHEDULE H (Form 5500)

Department of the Treasury
Internal Revenue Service

Department of Labor
Employee Benefits Security Administration

Pension Benefit Guaranty Corporation

Financial Information

This schedule is required to be filed under section 104 of the Employee Retirement Income Security Act of 1974 (ERISA), and section 6058(a) of the Internal Revenue Code (the Code).

▶ **File as an attachment to Form 5500.**

OMB No. 1210-0110

2018

This Form is Open to Public Inspection

For calendar plan year 2018 or fiscal plan year beginning 10/01/2018 and ending 09/30/2019

A Name of plan
FIRST COMMAND FINANCIAL PLANNING, INC. 401(K)-EMPLOYEE STOCK OWNERSHIP PLAN

B Three-digit plan number (PN) ▶ 001

C Plan sponsor's name as shown on line 2a of Form 5500
FIRST COMMAND FINANCIAL PLANNING, INC.

D Employer Identification Number (EIN)
75-1054341

Part I Asset and Liability Statement

1 Current value of plan assets and liabilities at the beginning and end of the plan year. Combine the value of plan assets held in more than one trust. Report the value of the plan's interest in a commingled fund containing the assets of more than one plan on a line-by-line basis unless the value is reportable on lines 1c(9) through 1c(14). Do not enter the value of that portion of an insurance contract which guarantees, during this plan year, to pay a specific dollar benefit at a future date. **Round off amounts to the nearest dollar.** MTIAs, CCTs, PSAs, and 103-12 IEs do not complete lines 1b(1), 1b(2), 1c(8), 1g, 1h, and 1i. CCTs, PSAs, and 103-12 IEs also do not complete lines 1d and 1e. See instructions.

Assets		(a) Beginning of Year	(b) End of Year
a Total noninterest-bearing cash	1a		
b Receivables (less allowance for doubtful accounts):			
(1) Employer contributions	1b(1)	5905227	6854829
(2) Participant contributions	1b(2)	0	0
(3) Other	1b(3)	0	0
c General investments:			
(1) Interest-bearing cash (include money market accounts & certificates of deposit)	1c(1)		
(2) U.S. Government securities	1c(2)		
(3) Corporate debt instruments (other than employer securities):			
(A) Preferred	1c(3)(A)		
(B) All other	1c(3)(B)		
(4) Corporate stocks (other than employer securities):			
(A) Preferred	1c(4)(A)		
(B) Common	1c(4)(B)		
(5) Partnership/joint venture interests	1c(5)		
(6) Real estate (other than employer real property)	1c(6)		
(7) Loans (other than to participants)	1c(7)		
(8) Participant loans	1c(8)	591802	706452
(9) Value of interest in common/collective trusts	1c(9)	219911	289298
(10) Value of interest in pooled separate accounts	1c(10)		
(11) Value of interest in master trust investment accounts	1c(11)		
(12) Value of interest in 103-12 investment entities	1c(12)		
(13) Value of interest in registered investment companies (e.g., mutual funds)	1c(13)	49765193	55742566
(14) Value of funds held in insurance company general account (unallocated contracts)	1c(14)		
(15) Other	1c(15)		

			(a) Beginning of Year	(b) End of Year
1d	Employer-related investments:			
	(1) Employer securities	1d(1)	107799794	116263470
	(2) Employer real property	1d(2)		
e	Buildings and other property used in plan operation	1e		
f	Total assets (add all amounts in lines 1a through 1e)	1f	164281927	179856615
	Liabilities			
g	Benefit claims payable	1g	7490532	12820006
h	Operating payables	1h	0	
i	Acquisition indebtedness	1i	0	
j	Other liabilities	1j	0	
k	Total liabilities (add all amounts in lines 1g through1j)	1k	7490532	12820006
	Net Assets			
l	Net assets (subtract line 1k from line 1f)	1l	156791395	167036609

Part II Income and Expense Statement

2 Plan income, expenses, and changes in net assets for the year. Include all income and expenses of the plan, including any trust(s) or separately maintained fund(s) and any payments/receipts to/from insurance carriers. Round off amounts to the nearest dollar. MTIAs, CCTs, PSAs, and 103-12 IEs do not complete lines 2a, 2b(1)(E), 2e, 2f, and 2g.

	Income		(a) Amount	(b) Total
a	**Contributions:**			
	(1) Received or receivable in cash from: **(A)** Employers	2a(1)(A)	6854829	
	(B) Participants	2a(1)(B)	3091226	
	(C) Others (including rollovers)	2a(1)(C)	835477	
	(2) Noncash contributions	2a(2)	0	
	(3) Total contributions. Add lines **2a(1)(A), (B), (C),** and line **2a(2)**	2a(3)		10781532
b	**Earnings on investments:**			
	(1) Interest:			
	(A) Interest-bearing cash (including money market accounts and certificates of deposit)	2b(1)(A)	0	
	(B) U.S. Government securities	2b(1)(B)	0	
	(C) Corporate debt instruments	2b(1)(C)	0	
	(D) Loans (other than to participants)	2b(1)(D)	0	
	(E) Participant loans	2b(1)(E)	40340	
	(F) Other	2b(1)(F)	0	
	(G) Total interest. Add lines **2b(1)(A)** through **(F)**	2b(1)(G)		40340
	(2) Dividends: **(A)** Preferred stock	2b(2)(A)	0	
	(B) Common stock	2b(2)(B)	8758169	
	(C) Registered investment company shares (e.g. mutual funds)	2b(2)(C)	806755	
	(D) Total dividends. Add lines **2b(2)(A)**, **(B)**, and **(C)**	2b(2)(D)		9564924
	(3) Rents	2b(3)		0
	(4) Net gain (loss) on sale of assets: **(A)** Aggregate proceeds	2b(4)(A)	0	
	(B) Aggregate carrying amount (see instructions)	2b(4)(B)	0	
	(C) Subtract line **2b(4)(B)** from line **2b(4)(A)** and enter result	2b(4)(C)		0
	(5) Unrealized appreciation (depreciation) of assets: **(A)** Real estate	2b(5)(A)	0	
	(B) Other	2b(5)(B)	8463676	
	(C) Total unrealized appreciation of assets. Add lines **2b(5)(A)** and **(B)**	2b(5)(C)		8463676

		(a) Amount	(b) Total
(6) Net investment gain (loss) from common/collective trusts	2b(6)		6576
(7) Net investment gain (loss) from pooled separate accounts	2b(7)		0
(8) Net investment gain (loss) from master trust investment accounts	2b(8)		0
(9) Net investment gain (loss) from 103-12 investment entities	2b(9)		0
(10) Net investment gain (loss) from registered investment companies (e.g., mutual funds)	2b(10)		1064409
c Other income	2c		0
d Total income. Add all **income** amounts in column (b) and enter total	2d		29921457
Expenses			
e Benefit payment and payments to provide benefits:			
(1) Directly to participants or beneficiaries, including direct rollovers	2e(1)	19548716	
(2) To insurance carriers for the provision of benefits	2e(2)	0	
(3) Other	2e(3)	12267	
(4) Total benefit payments. Add lines **2e(1)** through **(3)**	2e(4)		19560983
f Corrective distributions (see instructions)	2f		9428
g Certain deemed distributions of participant loans (see instructions)	2g		0
h Interest expense	2h		0
i Administrative expenses: (1) Professional fees	2i(1)	0	
(2) Contract administrator fees	2i(2)	105820	
(3) Investment advisory and management fees	2i(3)	0	
(4) Other	2i(4)	12	
(5) Total administrative expenses. Add lines **2i(1)** through **(4)**	2i(5)		105832
j Total expenses. Add all **expense** amounts in column (b) and enter total	2j		19676243
Net Income and Reconciliation			
k Net income (loss). Subtract line **2j** from line **2d**	2k		10245214
l Transfers of assets:			
(1) To this plan	2l(1)		0
(2) From this plan	2l(2)		

Part III Accountant's Opinion

3 Complete lines 3a through 3c if the opinion of an independent qualified public accountant is attached to this Form 5500. Complete line 3d if an opinion is not attached.

a The attached opinion of an independent qualified public accountant for this plan is (see instructions):

(1) ☐ Unqualified **(2)** ☐ Qualified **(3)** ☒ Disclaimer **(4)** ☐ Adverse

b Did the accountant perform a limited scope audit pursuant to 29 CFR 2520.103-8 and/or 103-12(d)? ☒ Yes ☐ No

c Enter the name and EIN of the accountant (or accounting firm) below:

(1) Name: HINCKLEY COOK PC **(2)** EIN: 75-2799562

d The opinion of an independent qualified public accountant is **not attached** because:

(1) ☐ This form is filed for a CCT, PSA, or MTIA. **(2)** ☐ It will be attached to the next Form 5500 pursuant to 29 CFR 2520.104-50.

Part IV Compliance Questions

4 CCTs and PSAs do not complete Part IV. MTIAs, 103-12 IEs, and GIAs do not complete lines 4a, 4e, 4f, 4g, 4h, 4k, 4m, 4n, or 5. 103-12 IEs also do not complete lines 4j and 4l. MTIAs also do not complete line 4l.

During the plan year:

		Yes	No	Amount
a Was there a failure to transmit to the plan any participant contributions within the time period described in 29 CFR 2510.3-102? Continue to answer "Yes" for any prior year failures until fully corrected. (See instructions and DOL's Voluntary Fiduciary Correction Program.)	4a		X	0
b Were any loans by the plan or fixed income obligations due the plan in default as of the close of the plan year or classified during the year as uncollectible? Disregard participant loans secured by participant's account balance. (Attach Schedule G (Form 5500) Part I if "Yes" is checked.)	4b		X	0

			Yes	No	Amount
c	Were any leases to which the plan was a party in default or classified during the year as uncollectible? (Attach Schedule G (Form 5500) Part II if "Yes" is checked.)	4c		X	0
d	Were there any nonexempt transactions with any party-in-interest? (Do not include transactions reported on line 4a. Attach Schedule G (Form 5500) Part III if "Yes" is checked.)	4d		X	0
e	Was this plan covered by a fidelity bond?	4e	X		1000000
f	Did the plan have a loss, whether or not reimbursed by the plan's fidelity bond, that was caused by fraud or dishonesty?	4f		X	
g	Did the plan hold any assets whose current value was neither readily determinable on an established market nor set by an independent third party appraiser?	4g		X	
h	Did the plan receive any noncash contributions whose value was neither readily determinable on an established market nor set by an independent third party appraiser?	4h		X	
i	Did the plan have assets held for investment? (Attach schedule(s) of assets if "Yes" is checked, and see instructions for format requirements.)	4i	X		
j	Were any plan transactions or series of transactions in excess of 5% of the current value of plan assets? (Attach schedule of transactions if "Yes" is checked, and see instructions for format requirements.)	4j		X	
k	Were all the plan assets either distributed to participants or beneficiaries, transferred to another plan, or brought under the control of the PBGC?	4k		X	
l	Has the plan failed to provide any benefit when due under the plan?	4l		X	
m	If this is an individual account plan, was there a blackout period? (See instructions and 29 CFR 2520.101-3.)	4m		X	
n	If 4m was answered "Yes," check the "Yes" box if you either provided the required notice or one of the exceptions to providing the notice applied under 29 CFR 2520.101-3.	4n			

5a Has a resolution to terminate the plan been adopted during the plan year or any prior plan year? ☐ Yes ☒ No
If "Yes," enter the amount of any plan assets that reverted to the employer this year _____.

5b If, during this plan year, any assets or liabilities were transferred from this plan to another plan(s), identify the plan(s) to which assets or liabilities were transferred. (See instructions.)

5b(1) Name of plan(s)	**5b(2)** EIN(s)	**5b(3)** PN(s)

5c If the plan is a defined benefit plan, is it covered under the PBGC insurance program (See ERISA section 4021.)? ..... ☐ Yes ☐ No ☐ Not determined
If "Yes" is checked, enter the My PAA confirmation number from the PBGC premium filing for this plan year_____. (See instructions.)

SCHEDULE R (Form 5500)

Department of the Treasury
Internal Revenue Service

Department of Labor
Employee Benefits Security Administration

Pension Benefit Guaranty Corporation

Retirement Plan Information

This schedule is required to be filed under sections 104 and 4065 of the Employee Retirement Income Security Act of 1974 (ERISA) and section 6058(a) of the Internal Revenue Code (the Code).

▶ **File as an attachment to Form 5500.**

OMB No. 1210-0110

2018

This Form is Open to Public Inspection.

For calendar plan year 2018 or fiscal plan year beginning 10/01/2018 and ending 09/30/2019

A Name of plan
FIRST COMMAND FINANCIAL PLANNING, INC. 401(K)-EMPLOYEE STOCK OWNERSHIP PLAN

B Three-digit plan number (PN) ▶ 001

C Plan sponsor's name as shown on line 2a of Form 5500
FIRST COMMAND FINANCIAL PLANNING, INC.

D Employer Identification Number (EIN)
75-1054341

Part I Distributions

All references to distributions relate only to payments of benefits during the plan year.

1 Total value of distributions paid in property other than in cash or the forms of property specified in the instructions **1** 0

2 Enter the EIN(s) of payor(s) who paid benefits on behalf of the plan to participants or beneficiaries during the year (if more than two, enter EINs of the two payors who paid the greatest dollar amounts of benefits):

EIN(s): 42-0127290 43-1971558

Profit-sharing plans, ESOPs, and stock bonus plans, skip line 3.

3 Number of participants (living or deceased) whose benefits were distributed in a single sum, during the plan year **3**

Part II Funding Information (If the plan is not subject to the minimum funding requirements of section 412 of the Internal Revenue Code or ERISA section 302, skip this Part.)

4 Is the plan administrator making an election under Code section 412(d)(2) or ERISA section 302(d)(2)? ..... ☐ **Yes** ☐ **No** ☐ **N/A**

If the plan is a defined benefit plan, go to line 8.

5 If a waiver of the minimum funding standard for a prior year is being amortized in this plan year, see instructions and enter the date of the ruling letter granting the waiver. **Date:** Month _____ Day _____ Year _____

If you completed line 5, complete lines 3, 9, and 10 of Schedule MB and do not complete the remainder of this schedule.

6 **a** Enter the minimum required contribution for this plan year (include any prior year accumulated funding deficiency not waived) **6a**

b Enter the amount contributed by the employer to the plan for this plan year **6b**

c Subtract the amount in line 6b from the amount in line 6a. Enter the result (enter a minus sign to the left of a negative amount) **6c**

If you completed line 6c, skip lines 8 and 9.

7 Will the minimum funding amount reported on line 6c be met by the funding deadline? ..... ☐ **Yes** ☐ **No** ☐ **N/A**

8 If a change in actuarial cost method was made for this plan year pursuant to a revenue procedure or other authority providing automatic approval for the change or a class ruling letter, does the plan sponsor or plan administrator agree with the change? ..... ☐ **Yes** ☐ **No** ☐ **N/A**

Part III Amendments

9 If this is a defined benefit pension plan, were any amendments adopted during this plan year that increased or decreased the value of benefits? If yes, check the appropriate box. If no, check the "No" box. ..... ☐ **Increase** ☐ **Decrease** ☐ **Both** ☐ **No**

Part IV ESOPs (see instructions). If this is not a plan described under section 409(a) or 4975(e)(7) of the Internal Revenue Code, skip this Part.

10 Were unallocated employer securities or proceeds from the sale of unallocated securities used to repay any exempt loan? ..... ☐ **Yes** ☒ **No**

11 **a** Does the ESOP hold any preferred stock? ..... ☐ **Yes** ☒ **No**

b If the ESOP has an outstanding exempt loan with the employer as lender, is such loan part of a "back-to-back" loan? (See instructions for definition of "back-to-back" loan.) ..... ☐ **Yes** ☒ **No**

12 Does the ESOP hold any stock that is not readily tradable on an established securities market? ..... ☒ **Yes** ☐ **No**

Part V Additional Information for Multiemployer Defined Benefit Pension Plans

13 Enter the following information for each employer that contributed more than 5% of total contributions to the plan during the plan year (measured in dollars). See instructions. *Complete as many entries as needed to report all applicable employers.*

a Name of contributing employer

b EIN **c** Dollar amount contributed by employer

d Date collective bargaining agreement expires *(If employer contributes under more than one collective bargaining agreement, check box* ☐ *and see instructions regarding required attachment. Otherwise, enter the applicable date.)* Month _____ Day _____ Year _____

e Contribution rate information *(If more than one rate applies, check this box* ☐ *and see instructions regarding required attachment. Otherwise, complete lines 13e(1) and 13e(2).)*
(1) Contribution rate (in dollars and cents) _____
(2) Base unit measure: ☐ Hourly ☐ Weekly ☐ Unit of production ☐ Other (specify):

---

a Name of contributing employer

b EIN **c** Dollar amount contributed by employer

d Date collective bargaining agreement expires *(If employer contributes under more than one collective bargaining agreement, check box* ☐ *and see instructions regarding required attachment. Otherwise, enter the applicable date.)* Month _____ Day _____ Year _____

e Contribution rate information *(If more than one rate applies, check this box* ☐ *and see instructions regarding required attachment. Otherwise, complete lines 13e(1) and 13e(2).)*
(1) Contribution rate (in dollars and cents) _____
(2) Base unit measure: ☐ Hourly ☐ Weekly ☐ Unit of production ☐ Other (specify): _____

---

a Name of contributing employer

b EIN **c** Dollar amount contributed by employer

d Date collective bargaining agreement expires *(If employer contributes under more than one collective bargaining agreement, check box* ☐ *and see instructions regarding required attachment. Otherwise, enter the applicable date.)* Month _____ Day _____ Year _____

e Contribution rate information *(If more than one rate applies, check this box* ☐ *and see instructions regarding required attachment. Otherwise, complete lines 13e(1) and 13e(2).)*
(1) Contribution rate (in dollars and cents) _____
(2) Base unit measure: ☐ Hourly ☐ Weekly ☐ Unit of production ☐ Other (specify): _____

---

a Name of contributing employer

b EIN **c** Dollar amount contributed by employer

d Date collective bargaining agreement expires *(If employer contributes under more than one collective bargaining agreement, check box* ☐ *and see instructions regarding required attachment. Otherwise, enter the applicable date.)* Month _____ Day _____ Year _____

e Contribution rate information *(If more than one rate applies, check this box* ☐ *and see instructions regarding required attachment. Otherwise, complete lines 13e(1) and 13e(2).)*
(1) Contribution rate (in dollars and cents) _____
(2) Base unit measure: ☐ Hourly ☐ Weekly ☐ Unit of production ☐ Other (specify): _____

---

a Name of contributing employer

b EIN **c** Dollar amount contributed by employer

d Date collective bargaining agreement expires *(If employer contributes under more than one collective bargaining agreement, check box* ☐ *and see instructions regarding required attachment. Otherwise, enter the applicable date.)* Month _____ Day _____ Year _____

e Contribution rate information *(If more than one rate applies, check this box* ☐ *and see instructions regarding required attachment. Otherwise, complete lines 13e(1) and 13e(2).)*
(1) Contribution rate (in dollars and cents) _____
(2) Base unit measure: ☐ Hourly ☐ Weekly ☐ Unit of production ☐ Other (specify): _____

---

a Name of contributing employer

b EIN **c** Dollar amount contributed by employer

d Date collective bargaining agreement expires *(If employer contributes under more than one collective bargaining agreement, check box* ☐ *and see instructions regarding required attachment. Otherwise, enter the applicable date.)* Month _____ Day _____ Year _____

e Contribution rate information *(If more than one rate applies, check this box* ☐ *and see instructions regarding required attachment. Otherwise, complete lines 13e(1) and 13e(2).)*
(1) Contribution rate (in dollars and cents) _____
(2) Base unit measure: ☐ Hourly ☐ Weekly ☐ Unit of production ☐ Other (specify): _____

14 Enter the number of participants on whose behalf no contributions were made by an employer as an employer of the participant for:

a The current year	**14a**	
b The plan year immediately preceding the current plan year	**14b**	
c The second preceding plan year	**14c**	

15 Enter the ratio of the number of participants under the plan on whose behalf no employer had an obligation to make an employer contribution during the current plan year to:

a The corresponding number for the plan year immediately preceding the current plan year	**15a**	
b The corresponding number for the second preceding plan year	**15b**	

16 Information with respect to any employers who withdrew from the plan during the preceding plan year:

a Enter the number of employers who withdrew during the preceding plan year	**16a**	
b If line 16a is greater than 0, enter the aggregate amount of withdrawal liability assessed or estimated to be assessed against such withdrawn employers	**16b**	

17 If assets and liabilities from another plan have been transferred to or merged with this plan during the plan year, check box and see instructions regarding supplemental information to be included as an attachment. ☐

Part VI Additional Information for Single-Employer and Multiemployer Defined Benefit Pension Plans

18 If any liabilities to participants or their beneficiaries under the plan as of the end of the plan year consist (in whole or in part) of liabilities to such participants and beneficiaries under two or more pension plans as of immediately before such plan year, check box and see instructions regarding supplemental information to be included as an attachment ☐

19 If the total number of participants is 1,000 or more, complete lines (a) through (c)

a Enter the percentage of plan assets held as:
Stock: _____% Investment-Grade Debt: _____% High-Yield Debt: _____% Real Estate: _____% Other: _____%

b Provide the average duration of the combined investment-grade and high-yield debt:
☐ 0-3 years ☐ 3-6 years ☐ 6-9 years ☐ 9-12 years ☐ 12-15 years ☐ 15-18 years ☐ 18-21 years ☐ 21 years or more

c What duration measure was used to calculate line 19(b)?
☐ Effective duration ☐ Macaulay duration ☐ Modified duration ☐ Other (specify):

FIRST COMMAND FINANCIAL PLANNING, INC. 401(k) - EMPLOYEE STOCK OWNERSHIP PLAN

Financial Statements at
September 30, 2019 and 2018,
and for the year ended September 30, 2019
with Independent Auditor's Report

FIRST COMMAND FINANCIAL PLANNING, INC.
401(k) - EMPLOYEE STOCK OWNERSHIP PLAN

Financial Statements at September 30. 2019 and 2018,
and for the year ended September 30, 2019
with Independent Auditor's Report

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Hinckley Cook P.C.
Certified Public Accountants

INDEPENDENT AUDITOR'S REPORT

To the Trustees of the
First Command Financial Planning, Inc. 401(k) - Employee Stock Ownership Plan:

Report on the Financial Statements

We were engaged to audit the accompanying financial statements of First Command Financial Planning, Inc. 401(k) - Employee Stock Ownership Plan (Plan), which comprise the statements of net assets available for benefits as of September 30, 2019 and 2018, and the related statements of changes in net assets available for benefits for the year ended September 30, 2019, and the related notes to the financial statements.

Management's Responsibility for the Financial Statements

Management is responsible for the preparation and fair presentation of these financial statements in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

Auditor's Responsibility

Our responsibility is to express an opinion on these financial statements based on conducting the audit in accordance with auditing standards generally accepted in the United States of America. Because of the matter described in the Basis for Disclaimer of Opinion paragraph, however, we were not able to obtain sufficient appropriate audit evidence to provide a basis for an audit opinion.

Basis for Disclaimer of Opinion

As permitted by 29 CFR 2520.103-8 of the Department of Labor's Rules and Regulations for Reporting and Disclosure under the Employee Retirement Income Security Act of 1974, the plan administrator instructed us not to perform, and we did not perform, any auditing procedures with respect to the information summarized in Note 4, which was certified by Principal Trust Company, the custodian of the 401(k) profit sharing portion of the Plan, except for comparing the information with the related information included in the financial statements. We have been informed by the plan administrator that the custodian holds the Plan's investment assets and executes investment transactions. The plan administrator has obtained a certification from the custodian, as of and for the years ended September 30, 2019 and 2018, that the information provided to the plan administrator by the custodian is complete and accurate.

2005 East Lamar Boulevard
Arlington, Texas 76006
Phone (817) 265-1040
Fax (817) 265-6914

2591 Dallas Parkway, Suite 300
Frisco, Texas 75034
Phone (972) 335-1553
Fax (469) 574-5777

Disclaimer of Opinion

Because of the significance of the matter described in the Basis for Disclaimer of Opinion paragraph, we have not been able to obtain sufficient appropriate audit evidence to provide a basis for an audit opinion. Accordingly, we do not express an opinion on these financial statements.

Other Matter

The supplemental schedule of assets (held at end of year) as of September 30, 2019, is required by the Department of Labor's Rules and Regulations for Reporting and Disclosure under the Employee Retirement Income Security Act of 1974 and is presented for the purpose of additional analysis, and is not a required part of the financial statements. Because of the significance of the matter described in the Basis for Disclaimer of Opinion paragraph, we do not express an opinion on the supplemental schedule referred to above.

Report on Form and Content in Compliance with DOL Rules and Regulations

The form and content of the information included in the financial statements and supplemental schedule, other than that derived from the information certified by the custodian, have been audited by us in accordance with auditing standards generally accepted in the United States of America and, in our opinion, are presented in compliance with the Department of Labor's Rules and Regulations for Reporting and Disclosure under the Employee Retirement Income Security Act of 1974.

Hinckley Cook P.C.

Hinckley Cook P.C.

Arlington, Texas
July 14, 2020

FIRST COMMAND FINANCIAL PLANNING, INC.
401(k) - EMPLOYEE STOCK OWNERSHIP PLAN

STATEMENT OF NET ASSETS AVAILABLE FOR BENEFITS
September 30, 2019 and 2018

	2019	2018
ASSETS:		
Investments:		
Nonparticipant-directed investment in common stock, at fair value	$ 116,263,470	$ 107,799,794
Participant directed investments at fair value	56,031,864	49,985,104
Total investments at fair value	172,295,334	157,784,898
Receivables:		
Employer's cash contribution receivable	6,854,829	5,905,227
Notes receivable from participants	706,452	591,802
Total receivables	7,561,281	6,497,029
Total Assets	179,856,615	164,281,927
Net Assets Available for Benefits	$ 179,856,615	$ 164,281,927

The accompanying notes are an integral part of these financial statements.

FIRST COMMAND FINANCIAL PLANNING, INC.
401(k) – EMPLOYEE STOCK OWNERSHIP PLAN

STATEMENT OF CHANGES IN NET ASSETS AVAILABLE FOR BENEFITS
Year ended September 30, 2019

ADDITIONS		
Additions to net assets attributed to:		
Investment Income:		
Net appreciation in fair value of nonparticipant-directed investment in common stock	$	8,463,676
Net appreciation (depreciation) in fair value of investments in mutual funds		1,064,409
Net appreciation (depreciation) in fair value of investments in common/collective trusts		6,576
Dividends on nonparticipant-directed common stock		8,758,169
Dividends on investments in mutual funds		806,755
Total investment income		19,099,585
Interest earned on notes receivable from participants		40,340
Contributions:		
Employer's		6,854,829
Participants'		3,091,226
Rollovers		835,477
Total contributions		10,781,532
Total Additions		29,921,457
DEDUCTIONS		
Deductions from net assets attributed to:		
Participant withdrawals		14,219,242
Corrective and other payments made to participants		21,695
Administration and other administration expenses		105,832
Total Deductions		14,346,769
Net Increase		15,574,688
Net assets available for benefits, beginning of year		164,281,927
Net assets available for benefits, end of year	$	179,856,615

The accompanying notes are an integral part of these financial statements.

FIRST COMMAND FINANCIAL PLANNING, INC.
401(k) - EMPLOYEE STOCK OWNERSHIP PLAN

NOTES TO FINANCIAL STATEMENTS

NOTE 1 - PLAN DESCRIPTION AND BASIS OF PRESENTATION

The following brief description of the First Command Financial Planning, Inc. 401(k) - Employee Stock Ownership Plan (the Plan) is provided for general information purposes only. Participants should refer to the Plan Agreement for complete information.

First Command Financial Planning, Inc. (Company) established the Plan effective as of November 5, 1964. The Plan is designed to comply with Section 401 (a) of the Internal Revenue Code (Code) and the Trust associated with the Plan is intended to be exempt from tax under Section 501 (a) of the Code. A portion of the Plan is a stock bonus plan and an employee stock ownership plan, which is commonly referred to as an ESOP. The ESOP portion is invested entirely in qualified employer securities. The remaining portion of the Plan is a profit-sharing plan (PSP). The profit-sharing portion also contains a cash or deferred arrangement commonly referred to as a 401(k) feature that allows participants to defer a portion of their salary into the Plan on a pre-tax or after-tax basis. The Plan is subject to the applicable provisions of the Employee Retirement Income Security Act of 1974, as amended (ERISA). An independent third party serves as Trustee and has exclusive authority and discretion to manage and control the assets of the ESOP, except to the extent the Plan document expressly provides that the Trustee be subject to the direction of the ESOP Committee. The ESOP Committee consists of officers or other employees who serve at the request of the board of directors of the Company. A Plan Administrator appointed by the Advisory Committee administers the Plan.

The Plan purchased common shares of First Command Financial Services, Inc. (FCFS), parent of the Company, using the participants' proceeds from transferring funds from the Company's Profit Sharing Plan. Accordingly, the shares in the Plan were all allocated to participants' accounts as of September 30, 2003.

Merger and Plan Amendments

Effective September 30, 2006, First Command Financial Planning, Inc. which sponsor's both this plan, the "First Command Financial Planning, Inc. Employee Stock Ownership Plan" (the ESOP), and the former "First Command Financial Planning, Inc Profit Sharing Plan" (the Profit Sharing Plan), merged the Profit Sharing Plan into the ESOP in accordance with Internal Revenue Code Sections 401(a) (12), and 414(l) and Section 208 of ERISA. The name of the ESOP was changed simultaneously to the First Command Financial Planning, Inc. 401(k) - Employee Stock Ownership Plan. Under the terms of the merger, each participant in the Profit-Sharing Plan and the ESOP would receive a benefit immediately after the merger, which is equal to the benefit he or she would have been entitled to receive immediately before the merger. Additionally, the ESOP plan was amended to accept the transfer of all trust assets from the Profit-Sharing Trust as of September 30, 2006. The Plan shall be administered by a Committee which shall be appointed by the Board.

NOTE 1 - PLAN DESCRIPTION AND BASIS OF PRESENTATION (continued)

Amendments were made to the First Command Financial Planning, Inc. 401(k) – Employee Stock Ownership Plan to be effective as of October 1, 2006. The Plan was amended to allow participants to make a separate deferral election under the Plan with respect to any bonus payments that are not currently available as of the time of the deferral election and the eligibility age was lowered from age 21 to age 18. Effective on or after October 1, 2007, an eligible employee shall become a participant for purposes of elective contributions and safe harbor contributions as of the first day of employment. In the event an eligible employee has not completed a salary reduction agreement, effective for the first paycheck issued after July 1, 2009, such eligible employee shall be deemed to have made an election to reduce his or her compensation by 1% for each payroll period and shall be automatically enrolled in the Plan. The automatic contributions deferred shall be pre-tax elective contributions. Effective August 1, 2010, the Plan was amended to permit participants to change their salary reduction elections and investment elections each pay period.

The administration committee of the Plan amended and restated the Plan effective October 1, 2011. As a result of the amendment, for Plan years commencing on or after October 1, 2011, no safe harbor contributions shall be made with respect to compensation earned on or after October 1, 2011, by any eligible or short-term employees. Beginning October 1, 2011, all new employees who do not make a contribution election will enter the automatic enrollment feature of the Plan at a 2% contribution rate. Effective for the first paycheck issued after January 1, 2013, each advanced automatic participant whose contribution level has been at the same level for 12 months or longer shall be deemed to have made an election to increase his or her salary reduction percentage for such Plan year by an additional 1.5%. The 1.5% of compensation automatic increases shall continue on the subsequent anniversaries of such date per year until their election reduction reaches 10% or until such initial automatic participant makes an affirmative election by executing a salary reduction agreement. ESOP distribution requests received within 120 days of the last day of the Plan Year will be valued as of the valuation date immediately preceding the actual date of distribution. Distribution forms received on or after the 121st day shall be delayed until after the end of the then current Plan year and will be valued as of the valuation date on the last day of the then current Plan year.

Effective October 1, 2012, the Plan's retirement date definition was revised to the actual date on which the participant attains his 65th birthday or 5th anniversary of Plan participation commencement, whichever occurs later; or the date on which the participant is at least 50 years of age and the sum of the participant's age in years and vesting years of service equal at least 75 years. If a participant satisfies both definitions, the participant shall elect the date, which shall be his retirement date.

NOTE 1 - PLAN DESCRIPTION AND BASIS OF PRESENTATION (continued)

Effective as of October 1, 2013, the Plan was amended to clarify distributions following a participant's termination of employment, retirement, or death. The vested portion of such participant's company contribution account and ESOP account shall now be credited to a separate account ("Employment Termination Account") which shall be fully vested and non-forfeitable. The Company stock shall be divested at the value for such Company stock established as of the valuation date next following the participant's termination of employment. The proceeds from such divestiture shall be reinvested in one or more investment funds in accordance with the participant's election. To the extent the participant fails to direct the investment, such amount shall be invested in the investment fund or funds selected by the Trustee as the qualified default investment account.

Effective October 1, 2016, the Plan was amended to allow diversifications for all Plan years following the qualified election period of the Plan year and the five successive Plan year periods. The participant shall be permitted to direct up to 50 percent.

Eligibility

Employees of the Company and its participating subsidiaries, age 18 or older, are generally eligible to participate in the Plan as of the first day of employment for purposes of elective contributions and safe harbor contributions. After one year of service, which is defined as a 12-consecutive month period during which the employee is credited for at least 1,000 hours of service, and after attainment of age 18, an eligible employee shall become a participant for purposes of eligibility to receive allocations of Company contributions allocated to profit sharing accounts and ESOP accounts. Participants who do not have at least 1,000 hours of service during such Plan year or are not employed on the last working day of a Plan year are generally not eligible for an allocation of the Company profit sharing and ESOP contributions for such year.

Contributions

Each year the Company contributes to the Plan an amount of its current profits as determined by the Company's Board of Directors. Employees may contribute voluntarily to the 401(k) component of the Plan. Employees' voluntary contributions are subject to certain limitations. Participants direct the investment of their 401(k) contributions into various investment options offered by the Plan. The Plan currently offers 37 mutual funds and a stable value collective investment trust fund as investment options for the 401(k)/PSP portion of the Plan. Employees are not permitted to make contributions to the employee stock ownership portion of the Plan. The Employer may make its Company contribution to the Trust fund once each Plan year and it shall be deemed to have been made and shall be allocated to the Company or ESOP contribution accounts of eligible participants as of the earlier of the valuation date on or next following the date on which they are made to the Trust fund, or the last day of the Plan year for which they are made.

NOTE 1 - PLAN DESCRIPTION AND BASIS OF PRESENTATION (continued)

Payment of Benefits

No distributions from the Plan will be made until a participant retires, dies (in which case, payment shall be made to his or her beneficiary or, if none, his or her legal representatives), becomes permanently disabled or otherwise terminates employment with the Company and its participating subsidiaries. Distributions are made in cash. The value of the account is determined as of the most recent valuation date immediately preceding the date of distribution.

Under the provisions of the Plan, the Company is obligated to contribute enough to fund the repurchase of participant ESOP shares that have been distributed under the terms of the Plan as long as the shares are not publicly traded.

Voting Rights

The ESOP Trustee is authorized by the Plan document to exercise the voting rights attributable to the shares allocated to the accounts held in the Plan.

Termination

Although it has not expressed any intent to do so, the Company has the right under the Plan to terminate at any time, subject to Plan provisions. Upon such termination of the Plan, the interest of each participant in the trust fund will be distributed to such participant or his or her beneficiary at the time prescribed by the Plan terms, ERISA, and the Internal Revenue Code. In the event of Plan termination, participants will become 100% vested in their accounts.

Allocations to Participant Accounts

Separate individual accounts are established for each participant to account for contributions made by the employer and for shares of employer stock allocated. Only those participants who are eligible employees of the Company as of the last day of the Plan year will receive an allocation. Only employer contributions can be used to purchase common stock.

Each participant's account is also credited investment earnings, including asset appreciation (depreciation) and forfeitures of terminated participants' non-vested accounts. Allocations of earnings are based on participant account balances. Allocations of employer contributions and forfeitures are based on compensation, as defined by the Plan except as it pertains to the 401(k) component of the Plan, where allocations are based on the employee's voluntary contribution. The benefit to which a participant is entitled is the benefit that can be provided from the participant's account.

NOTE 1 - PLAN DESCRIPTION AND BASIS OF PRESENTATION (continued)

Vesting

For all Plan years beginning on or after October 1, 2006, participants vest according to the following schedule:

Years of Service	Vested Percentage
Less than 2 years	0
2 years	20
3 years	40
4 years	60
5 years	80
6 years or more	100

Voluntary contributions made by employees and qualified non-elective contributions made by the Company are 100% vested when made.

Diversification

Diversification is offered to participants close to retirement so that they may have the opportunity to move part of the value of their investment in common stock into investments that are more diversified. Participants who are at least age 55 and have at least 10 years of participation in the Plan, including participation in the Company's former profit-sharing Plan, may elect to diversify a portion of their account. In each of the first five years, a participant may diversify up to 25% of the number of shares allocated to his or her account, less any shares previously diversified. In the sixth year, the percentage changes to 50%. Such diversification is accomplished by allowing the participant to transfer a portion of their ESOP account balance to a participant-directed account invested under various investment options.

Forfeitures

Upon termination of employment by a participant that is not fully vested in the Plan, the non-vested portion of the participant's account balance is allocated to participants in the Plan in the period that the distribution is made. Employer contributions and Plan forfeitures are allocated to each participant's account based upon the relation of the participant's compensation to total compensation for the Plan year. Such allocation is first made to reinstate previously forfeited account balances of former participants. Any remaining forfeitures are used to reduce employer contributions or to pay reasonable Plan expenses. At September 30, 2019 and 2018, forfeited non-vested 401(k) accounts totaled $1,980 and $1,615, respectively, and there were no forfeited non-vested ESOP accounts.

NOTES TO FINANCIAL STATEMENTS

NOTE 1 - PLAN DESCRIPTION AND BASIS OF PRESENTATION (continued)

Notes Receivable from Participants

Participants may borrow from their 401(k) fund accounts a minimum of $3,000 up to a maximum of $50,000 reduced by the highest outstanding loan balance in the participant's account during the twelve-month period or 50% of their vested account balance, whichever is less. The loans are secured by the vested balance in the participant's account and bear interest at reasonable rates as determined by the Plan Committee based on prevailing rates. Principal and interest are paid ratably on at least a quarterly basis generally over a three-year period through payroll deductions. Participants may only have two loans outstanding at any given time.

Put Option

Under Federal income tax regulations, the employer stock that is held by the Plan and its participants and is not readily tradable on an established market, or is subject to trading limitations, includes a put option. The put option is a right to demand that the Company buy any shares of its stock distributed to participants for which there is no market. The put price is representative of the fair market value of the stock. The purpose of the put option is to ensure that the participant has the ability to ultimately obtain cash.

NOTE 2 - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

Basis of Accounting

The financial statements of the Plan are presented on the accrual basis of accounting in accordance with accounting principles generally accepted in the United States.

Estimates

The preparation of financial statements in conformity with generally accepted accounting principles requires the Plan administrator to make estimates and assumptions that affect certain reported amounts and disclosures. Accordingly, actual results may differ from those estimates.

Investment Valuation and Income Recognition

The Plan's investments are reported at fair value. Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date. See note 5 for discussion of fair value measurements.

Purchases and sales of securities are recorded on a trade-date basis. Interest income is recorded on an accrual basis. Dividends are recorded on the ex-dividend date. Net appreciation or depreciation of investments are reported in the statement of changes in net assets available for benefits and consists of the realized gains or losses on investments bought and sold as well as held during the year.

NOTE 2 - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

Notes Receivable from Participants

Notes receivable from participants are measured at their unpaid principal balance plus any accrued but unpaid interest. Delinquent participant loans are reclassified as distributions based upon the terms of the Plan document.

Administrative Expenses

Certain expenses incurred in the administration of the Plan are paid directly by the Company. Plan administration expenses in excess of the Company paid amount are deducted from the participant accounts. The individual participant pays any loan administration fees.

Payment of Benefits

Benefits are recorded when paid.

New Accounting Standard

In May 2015, the FASB issued Accounting Standards Update (ASU) 2015-07 Fair Value Measurement (Topic 820) *Disclosures for Investments in Certain Entities That Calculate Net Asset Value per Share (or Its Equivalent)* which resulted in removing fair values that are estimated using the net asset value practical expedient from the fair value hierarchy. In June 2015, ASU 2015-10 *Technical Corrections and Improvements* defined "readily determinable" if the fair value per share (unit) is determined and "published". The Plan early adopted this guidance during the reporting period beginning October 1, 2016. The fair value of the stable value common collective trust fund held by the Plan was measured using net asset value per share (or its equivalent) as a practical expedient and not included in the hierarchy. In July 2018, the FASB issued ASU 2018-09 *Amended Subtopic 962-325, Plan Accounting – Defined Contribution Plans – Investments - Other*: The update removes the stable value common collective trust fund from the illustrative example in paragraph 962-325-55-17 to avoid the interpretation that such an investment would never have a readily determinable fair value and, therefore, would always use the net asset value per share practical expedient. Rather, a plan should evaluate whether a readily determinable fair value exists to determine whether those investment options may qualify for the practical expedient to measure at net asset value in accordance with Topic 820, Fair Value Measurement. The amendments in this update are effective for fiscal years beginning after December 15, 2019. The Plan has determined that the stable value common collective trust fund has a published and readily determinable fair value and is the basis for current transactions in a manner similar to that of a mutual fund. The early adoption of Subtopic 962-325 is permitted and the Plan adopted this guidance during the year ended September 30, 2019 with retrospective application as required by the guidance. Adoption of this guidance has no impact to the net assets available for benefits or the changes in net assets available for benefits.

NOTE 2 - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

Reclassifications

Certain reclassifications have been made to the prior year's data to conform to the current year presentation. These reclassifications had no effect on reported net assets available for benefits.

Recent Accounting Pronouncements

In August 2018, the FASB issued ASU 2018-13 Disclosure Framework – Changes to the Disclosure Requirements for Fair Value Measurement, which amends and eliminates certain disclosure requirements for fair value as part of its framework project. The ASU is effective for all entities for fiscal years beginning after December 15, 2019. Adoption of this guidance has no impact to the net assets available for benefits or the changes in net assets available for benefits.

In August 2018, the FASB issued ASU 2018-14 *Compensation – Retirement Benefits – Defined Benefit Plans – General (Subtopic 715-20)* – The amendments in this FASB update remove disclosures that no longer are considered cost beneficial, clarify the specific requirements of disclosures, and add disclosure requirements identified as relevant. The amendments in this update are effective for fiscal years ending after December 15, 2021. Adoption of this guidance has no impact to the net assets available for benefits or the changes in net assets available for benefits.

NOTE 3 - NONPARTICIPANT-DIRECTED INVESTMENT

The Plan's nonparticipant-directed investment in First Command Financial Services, Inc. (FCFS) common stock at September 30, 2019 and 2018, is as follows:

	2019	2018
Number of Shares	6,158,088	6,158,088
Cost	$ 7,043,212	$ 7,043,212
Estimated Fair Value	$ 116,263,470	$ 107,799,794

The significant components included in the statement of changes in net assets available for benefits relating to the nonparticipant-directed investment in FCFS stock is as follows:

	Year Ended September 30, 2019
Changes in net assets:	
Employer contribution	$ 6,854,829
Dividend on common stock	8,758,169
Net appreciation	8,463,676
Benefits paid to participants	(7,487,612)

The fair value of the nonparticipant-directed investment is approximately 65% and 66% of the Plan's net assets at September 30, 2019 and 2018, respectively.

NOTE 4 - INFORMATION CERTIFIED BY CUSTODIAN (UNAUDITED)

The September 30, 2019 and September 30, 2018 statements of net assets available for benefits, the investment activities included on the statement of changes in net assets available for benefits for the year ended September 30, 2019, the accompanying notes to the financial statements and the supplemental schedule were prepared in part from information certified by the custodian of the 401(k)/PSP portion of the Plan, Principal Trust Company, in accordance with 29 CFR 2520.103-8 of the Department of Labor's Rules and Regulations for Reporting and Disclosure under the Employee Retirement Income Security Act of 1974. These investments are all participant-directed.

The Plan's independent accountants did not perform auditing procedures with respect to this information except for comparing such information to the related information included in the financial statements and supplemental schedule.

NOTE 5 - FAIR VALUE MEASUREMENTS

The fair value measurement accounting literature establishes a fair value hierarchy that prioritizes the inputs to valuation techniques used to measure fair value. The fair value hierarchy consists of three broad levels: Level 1 inputs to the valuation methodology consist of unadjusted quoted prices in active markets for identical assets that the Plan can access at the measurement date and have the highest priority. Level 2 inputs consist of observable inputs other than quoted prices included within level 1 that are observable for valuing the asset or liability, either directly or indirectly. Observable inputs include quoted price for similar assets or liabilities in active or non-active markets. Level 2 inputs may also include insignificant adjustments to market observable inputs. Level 3 inputs are based on unobservable inputs for the asset and have the lowest priority. The Plan uses appropriate valuation techniques based on the available inputs to measure the fair value of its investments. When available, the Plan measures fair value using Level 1 inputs because they generally provide the most reliable evidence of fair value. Level 2 inputs are used for investments for which Level 1 inputs were not available. Level 3 inputs would only be used if Level 1 or Level 2 inputs were not available. There are no plan assets requiring the use of Level 2 inputs for the periods presented.

The following is a description of the valuation methodologies used for assets measured at fair value on a recurring basis. There were no significant changes made to the valuation processes during 2019 or 2018.

- Level 1 Fair Value Measurements

  The fair value of mutual funds is based on quoted net asset values of the shares as reported by the fund. The mutual funds held by the Plan are open-end mutual funds registered with the U.S. Securities and Exchange Commission. The funds must publish their daily net asset value and transact at that price. The mutual funds held by the Plan are considered to be actively traded.

NOTE 5 - FAIR VALUE MEASUREMENTS (continued)

- Level 1 Fair Value Measurements (continued)

  The fair value of stable value collective investment trusts (CIT) are not publicly quoted but are available to current investors. The net asset value (NAV) is the basis for current transactions and the CIT can be redeemed at NAV as of the measurement date. The NAV is calculated in a manner consistent with GAAP for investment companies (mutual funds).

- Level 3 Fair Value Measurements

  The common shares of First Command Financial Services, Inc. (FCFS) are valued at estimated fair value on September 30, 2019 and 2018. An independent appraisal firm determined fair value.

The preceding methods may produce a fair value calculation that may not be indicative of net realizable value or reflective of future values. Furthermore, although the Plan believes its valuation methods are appropriate and consistent with other market participants, the use of different methodologies or assumptions to determine fair value of certain financial instruments could result in a different fair value measurement at the reporting date.

The following table sets forth by level, within the fair value hierarchy, the Plan's assets at fair value on a recurring basis as of September 30, 2019 and 2018:

	Assets at Fair Value as of September 30, 2019		
	Level 1	Level 3	Total
Mutual funds	$ 55,742,566	$ -	$ 55,742,566
Common collective trust fund	289,298	-	289,298
Common stock of FCFS	-	116,263,470	116,263,470
Total assets in the fair value hierarchy	56,031,864	116,263,470	172,295,334
Investments measured at net asset value	-	-	-
Investments at fair value	$ 56,031,864	$ 116,263,470	$ 172,295,334

	Assets at Fair Value as of September 30, 2018		
	Level 1	Level 3	Total
Mutual funds	$ 49,765,193	$ -	$ 49,765,193
Common collective trust fund	219,911	-	219,911
Common stock of FCFS	-	107,799,794	107,799,794
Total assets in the fair value hierarchy	49,985,104	107,799,794	157,784,898
Investments measured at net asset value	-	-	-
Investments at fair value	$ 49,985,104	$ 107,799,794	$ 157,784,898

NOTE 5 - FAIR VALUE MEASUREMENTS (continued)

Level 3 Gains and Losses

The following table sets forth a summary of changes in the fair value of the Plan's Level 3 assets:

	Level 3 Assets Year Ended September 30, 2019	
	Common Stock	Total
Balance, beginning of year	$ 107,799,794	$ 107,799,794
Purchases	14,663,396	14,663,396
Sales	(14,663,396)	(14,663,396)
Total gains included in changes in net assets available for benefits	8,463,676	8,463,676
Balance, end of year	$ 116,263,470	$ 116,263,470
The amount of total gains or losses for the period attributable to the change in unrealized gains or losses relating to assets held at the reporting date.	$ 8,463,676	$ 8,463,676

Level 3 gains included in changes in net assets available for benefits for the year ended September 30, 2019 are reported in net appreciation in fair value of nonparticipant-directed investments in common stock.

The common stock of FCFS is not actively traded and significant other observable inputs are not available. The fair value of the common stock of FCFS is determined by an annual independent appraisal. Two generally accepted valuation approaches, the market approach and the income approach, were used to arrive at the opinion of value as of September 30, 2019 and 2018. The appraiser took into account historical and projected cash flow and net income, return on assets, return on equity, market comparables, and estimated fair value of the Company assets and liabilities. The appropriate discount for limited marketability was also taken into consideration.

During fiscal years 2019 and 2018, there were transfers of $7,175,784 and $2,120,546, respectively, into Level 1 from Level 3 for diversifications and terminated participant ESOP vested account balances. Due to the adoption of a recently issued ASU, the stable value common collective trust was moved from outside the fair value hierarchy into Level 1.

NOTES TO FINANCIAL STATEMENTS

NOTE 6 - EMPLOYER CONTRIBUTIONS

The employer's contributions to the Plan are discretionary, so long as the Plan has no loan balances outstanding. As of September 30, 2019 and 2018, the Plan did not have a loan balance outstanding. The contribution to the ESOP portion of the Plan from the employer at September 30, 2019 and 2018 consists of repurchases from participants for the following:

	2019	2018
Participant diversification elections	$ 3,113,159	$ 3,888,372
Transfer of terminated ESOP participant balances to participant-directed investments	1,301,863	2,016,855
Distributions to former participants	2,439,807	-
Receivable: Employer's contribution	6,854,829	5,905,227
Forfeitures allocated – shares and cash	246,881	292,223
Prefunded for distributions to former participants	-	45,942
Total employer contribution	$ 7,101,710	$ 6,243,392

The employer paid cash dividends of $8,758,169 and $4,997,919 on common stock shares owned by the Plan during the fiscal years ending September 30, 2019 and 2018, respectively.

During fiscal years ending September 30, 2019 and 2018, the Company contributed enough to repurchase from participants 766,301 and 842,279 shares, respectively, at prices determined from independent appraisals. These shares were reallocated to remaining eligible participants at the Plan's year-end.

NOTE 7 - ADMINISTRATION OF PLAN ASSETS, RELATED PARTY AND PARTY-IN-INTEREST TRANSACTIONS

The Plan invested in common shares of First Command Financial Services, Inc., parent of the Company. An independent third-party trust company is custodian of the ESOP assets. The ESOP Trustee, who invests cash received and earnings of the Plan and is responsible for making distributions out of the Plan, manages company contributions.

Certain Plan investments are shares of mutual funds managed by Principal. Principal Trust Company is custodian of the 401(k)/PSP portion of the Plan and, therefore, these transactions qualify as party-in-interest transactions. Principal Life Insurance Company Retirement Plan Processing Services is the recordkeeper for the Plan.

Officers or employees of the Company or its subsidiaries perform certain administrative functions. No such officer or employee receives compensation from the Plan. Administrative expenses for the ESOP Trustee and its custodian and $20,000 of annual record keeper fees are paid directly by the Company. The Company made additional payments of approximately $195,367 and $241,860 during 2019 and 2018, respectively, for administrative fees that will not be reimbursed by the Plan.

These party-in-interest transactions are exempt from the prohibited transaction rules of ERISA.

NOTES TO FINANCIAL STATEMENTS

NOTE 8 - RECONCILIATION OF FINANCIAL STATEMENTS TO SCHEDULE H OF FORM 5500

The following is a reconciliation of net assets available for benefits per the financial statements at September 30, 2019 and 2018, to Schedule H of Form 5500:

	2019	2018
Net assets available for benefits per the financial statements	$ 179,856,615	$ 164,281,927
Less: Amounts allocated to withdrawing participants	(12,820,006)	(7,490,532)
Net assets available for benefits per Schedule H to the Form 5500	$ 167,036,609	$ 156,791,395

The following is a reconciliation of benefits paid to participants per the financial statements for the year ended September 30, 2019 to Schedule H of Form 5500:

Benefits paid to participants per the financial statements	$ 14,219,242
Add: Amounts allocated to withdrawing participants at September 30, 2019	12,820,006
Less: Amounts allocated to withdrawing participants at September 30, 2018	(7,490,532)
Benefits paid directly to participants or beneficiaries per Schedule H of Form 5500	$ 19,548,716

Net assets available for benefits at September 30, 2019 includes $12,820,006 allocated to the accounts of persons who as of or prior to that date had withdrawn from participating in the earnings and operations of the Plan. The amounts from the ESOP portion of the Plan to the former participants are payable in February 2020 and the amounts from the 401(k)/PSP portion of the Plan are payable throughout the fiscal year.

Net assets available for benefits at September 30, 2018 includes $7,490,532 allocated to the accounts of persons who as of or prior to that date had withdrawn from participating in the earnings and operations of the Plan. The amounts from the ESOP portion of the Plan to the former participants were paid in February 2019 and the amounts from the 401(k)/PSP portion of the Plan were paid throughout the fiscal year.

NOTE 9 - TAX STATUS

The Internal Revenue Service has determined and informed the Plan sponsor by a letter dated November 29, 2017, that the Plan and related trust are designed in accordance with applicable sections of the Internal Revenue Code (IRC). The Plan has been amended since receiving the determination letter. However, the Plan administrator and the Plan's tax counsel believe that the Plan is currently designed and being operated in compliance with the applicable requirements of the IRC. Therefore, the Plan sponsor believes that the Plan was qualified, and the related trust was tax-exempt as of the financial statement date. The Plan administrator believes the Plan is no longer subject to income tax examinations for fiscal years prior to year-end September 30, 2016.

Accounting principles generally accepted in the United States of America require the plan administrator to evaluate tax positions taken by the Plan and recognize a tax liability for any uncertain position that more likely than not would not be sustained upon examination by the IRS. The Plan is subject to routine audits by tax authorities; however, there are currently no audits for any tax periods in progress.

NOTE 10 – CONCENTRATIONS

At September 30, 2019, and 2018, approximately 65% and 66%, respectively, of the plan's assets were invested in First Command Financial Services, Inc., common stock. The underlying value of the shares is dependent on the performance of First Command Financial Services, Inc. and the market's overall view of the financial services industry and its performance. It is at least reasonably possible that changes in the fair value of First Command Financial Services, Inc. common stock in the near term could materially affect participants' account balances and the amounts reported in the statement of assets available for benefits and the statement of changes in assets available for benefits.

NOTE 11 - RISKS AND UNCERTAINTIES

The Plan provides for various investment options in any combination of balanced, equity and fixed - income mutual funds and a stable value common collective trust fund. Investment securities are exposed to various risks, such as interest rate, market, and credit risks. The underlying value of the common shares is dependent on the performance of First Command Financial Services, Inc. and the market's overall view of the financial services industry and its performance. Due to the risk associated with certain investments, it is at least reasonably possible that changes in the values of investment securities will occur in the near term and that such changes may materially affect participants' account balances and the amounts reported in the statement of net assets available for Plan benefits and the statement of changes in net assets available for Plan benefits. Credit risk is considered by management to be limited due to the common collective trust's financial stability and to the diversification of holdings within the mutual funds. The Plan generally does not require collateral with respect to its investments.

NOTE 12 – DATE OF MANAGEMENT'S REVIEW OF SUBSEQUENT EVENTS

For the year ended September 30, 2019, subsequent events were evaluated for potential recognition and disclosure through July 14, 2020, which is the date the financial statements were available to be issued. In January 2020, the World Health Organization declared the outbreak of a novel coronavirus (COVID-19) as a "Public Health Emergency of International Concern" which continues to spread throughout the world and has adversely impacted global commercial activity and contributed to significant declines and volatility in financial markets. The outbreak could have a continued material adverse impact on economic and market conditions and trigger a period of global economic slowdown. The rapid development and fluidity of this situation precludes any prediction as to the ultimate material adverse impact of the coronavirus outbreak. Nevertheless, the outbreak presents uncertainty and risk with respect to the Plan, its performance, and its financial results. The financial statements do not include any adjustments that might result from the outcome of this uncertainty.

SUPPLEMENTAL SCHEDULE

FIRST COMMAND FINANCIAL PLANNING, INC.
401(k) - EMPLOYEE STOCK OWNERSHIP PLAN
EIN: 75-1054341
PLAN: 001

Schedule H, Line 4i - Schedule of Assets (Held at End of Year)
For the Year Ended September 30, 2019

(a)	(b) Identity of Issue, Borrower, Lessor or Similar Party	(c) Description of Investment Including Maturity Date, Rate of Interest, Collateral, Par, or Maturity Value	(d) Cost	(e) Current Value
*	First Command Financial Services, Inc.	Employer common stock (6,158,088 shares)	$ 7,043,212	116,263,470
	Fidelity	Registered investment company FIDELITY INSTL MONEY MKT FDS GOVT	235	235
	MFS Investment Management	Registered investment company MFS U.S. GOV'T MONEY MARKET FUND	-0-	2,088,921
	Fidelity Investments	Registered investment company FIDELITY ADV NEW INSIGHTS Z FUND	-0-	7,772,507
	MFS Investment Management	Registered investment company MFS MASS INV GROWTH STK R6 FUND	-0-	2,083,654
	Aston Asset Management	Registered investment company AMG MGRS FAIRPOINTE MID CAP I FUND	-0-	3,016,566
	Franklin Templeton Investments	Registered investment company FRANKLIN MUTUAL GLOBAL DISC R6 FUND	-0-	4,411,469
	AMG Funds	Registered investment company AMG YACKTMAN I FUND	-0-	2,543,175
*	Principal Funds Inc.	Registered investment company PRIN LARGECAP GROWTH I R6 FUND	-0-	3,229,881
	Fidelity Investments	Registered investment company FID ADV FREEDOM 2010 Z6	-0-	21
	Fidelity Investments	Registered investment company FID ADV FREEDOM 2015 Z6	-0-	653,583
	Fidelity Investments	Registered investment company FID ADV FREEDOM INC Z6	-0-	1,841,571
	Fidelity Investments	Registered investment company FID ADV FREEDOM 2020 Z6	-0-	137,552
	First Pacific Advisors, LLC	Registered investment company FPA CRESCENT FUND	-0-	385,611
	Fidelity Investments	Registered investment company FID ADV FREEDOM 2025 Z6	-0-	4,743,165
	Fidelity Investments	Registered investment company FID ADV FREEDOM 2030 Z6	-0-	317,369
*	Principal Funds Inc.	Registered investment company PRIN DIVERSIFIED REAL ASSET R6 FD	-0-	332,262
	Franklin Templeton Investments	Registered investment company FRANKLIN CONSER ALLOC R6 FUND	-0-	340,387
	Fidelity Investments	Registered investment company FID ADV FREEDOM 2035 Z6	-0-	2,928,650
	Fidelity Investments	Registered investment company FID ADV FREEDOM 2040 Z6	-0-	434,691
	Fidelity Investments	Registered investment company FID ADV FREEDOM 2045 Z6	-0-	2,081,912
	Fidelity Investments	Registered investment company FID ADV FREEDOM 2050 Z6	-0-	127,955
	Fidelity Investments	Registered investment company FID ADV FREEDOM 2055 Z6	-0-	623,372
	Fidelity Investments	Registered investment company FID ADV FREEDOM 2060 Z6	-0-	24,313
	Franklin Templeton Investments	Registered investment company TEMPLETON GLOBAL BOND R6 FUND	-0-	626,865
	The Royce Funds	Registered investment company ROYCE TOTAL RETURN INST FUND	-0-	703,972

The accompanying notes are an integral part of this schedule.

FIRST COMMAND FINANCIAL PLANNING, INC.
401(k) - EMPLOYEE STOCK OWNERSHIP PLAN
EIN: 75-1054341
PLAN: 001

Schedule H, Line 4i - Schedule of Assets (Held at End of Year), continued
For the Year Ended September 30, 2019

(a)	(b) Identity of Issue, Borrower, Lessor or Similar Party	(c) Description of Investment Including Maturity Date, Rate of Interest, Collateral, Par, or Maturity Value	(d) Cost	(e) Current Value
	PRIMECAP Odyssey Funds	Registered investment company PRIMECAP ODYSSEY STOCK FUND	$ -0-	97,070
	Franklin Templeton Investments	Registered investment company FRANKLIN US GOVT SEC R6 FUND	-0-	1,959,139
*	Principal Funds Inc.	Registered investment company PRIN EQUITY INCOME INST FUND	-0-	2,099,970
*	Principal Funds Inc.	Registered investment company PRIN MIDCAP R6 FUND	-0-	2,684,724
	JOHCM Funds	Registered investment company JOHCM INTERNTL SELECT I FUND	-0-	342,819
	Blackrock Advisors, LLC	Registered investment company ISHARES MSCI TOT INTL INDEX K FUND	-0-	181,553
*	Principal Global Investors Trust Co.	Common/Collective investment trust fund MORLEY STABLE VALUE FUND	-0-	289,298
	Fidelity Investments	Registered investment company FIDELITY U.S. BOND INDEX FUND	-0-	880,182
	Blackrock Advisors, LLC	Registered investment company ISHARES RUSS SM/MD-CAP INDEX K FUND	-0-	687,836
	Blackrock Advisors, LLC	Registered investment company ISHARES S&P 500 INDEX K FUND	-0-	2,498,161
	Robert W. Baird & Co. Inc.	Registered investment company BAIRD CORE PLUS BOND I FUND	-0-	1,508,966
	Artisan	Registered investment company ARTISAN INTL VALUE INST FUND	-0-	1,064,107
	Artisan	Registered investment company ARTISAN DEVELOP WORLD INST FUND	-0-	167,353
	Artisan	Registered investment company ARTISAN HIGH INC INSTIT FUND	-0-	121,027
*	Participant Loans	Range of interest rates from 6.25% to 6.25%	-0-	706,452

* Represents a party-in-interest

The accompanying notes are an integral part of this schedule.

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SCHEDULE H, line 4i - SCHEDULE OF ASSETS (HELD AT END OF YEAR)

F C F P, I. 401()
P
EIN 75 1054341
PLAN NUMBER 001
PLAN YEAR 10/01/2018 TO 09/30/2019

(A)	(B) Identity of issuer, borrower, lessor or similar party.	(C) Description of investment including maturity date, rate of interest, collateral, par or maturity value.	(D) Cost	(E) Current Value
	BlackRock	Registered Investment Company iShares Russ Sm/Md-Cp Idx K Fd	$ 0.00	$ 687,836.47
	BlackRock	Registered Investment Company iShares S&P 500 Index K Fund	$ 0.00	$ 2,498,161.42
	BlackRock	Registered Investment Company iShs MSCI Tot Intl Idx K Fund	$ 0.00	$ 181,552.62
	Artisan	Registered Investment Company Artisan Intl Value Inst Fund	$ 0.00	$ 1,064,106.87
	Aston Asset Management	Registered Investment Company AMG Mgrs Fairpt Mid Cap I Fund	$ 0.00	$ 3,016,566.00
	AMG Funds	Registered Investment Company AMG Yacktman I Fund	$ 0.00	$ 2,543,174.96
	Artisan	Registered Investment Company ARTISAN DEVELOP WORLD INST FD	$ 0.00	$ 167,352.91
	Artisan	Registered Investment Company ARTISAN HIGH INC INSTIT FUND	$ 0.00	$ 121,026.74
	Baird	Registered Investment Company Baird Core Plus Bond I Fund	$ 0.00	$ 1,508,966.27
*	FIRST COMMAND FINANCIAL SERVICES, I	Employer Security ESOP - Employer Security	$ 7,043,212.00	$116,263,470.14
	Fidelity Investments	Registered Investment Company Fidelity Adv New Insights Z Fd	$ 0.00	$ 7,772,507.25
	Franklin Templeton Investments	Registered Investment Company Franklin Conser Alloc R6 Fund	$ 0.00	$ 340,386.88
	Franklin Templeton Investments	Registered Investment Company Franklin Mutual Glb Disc R6 Fd	$ 0.00	$ 4,411,468.77
	Franklin Templeton Investments	Registered Investment Company Franklin US Govt Sec R6 Fund	$ 0.00	$ 1,959,138.78
	Fidelity Investments	Registered Investment Company FID ADV FREEDOM INCOME Z6 FUND	$ 0.00	$ 1,841,571.48

SCHEDULE H, line 4i - SCHEDULE OF ASSETS (HELD AT END OF YEAR)

SCHEDULE H, line 4i - SCHEDULE OF ASSETS (HELD AT END OF YEAR)

F C F P, I. 401()
P
EIN 75 1054341
PLAN NUMBER 001
PLAN YEAR 10/01/2018 TO 09/30/2019

(A)	(B) Identity of issuer, borrower, lessor or similar party.	(C) Description of investment including maturity date, rate of interest, collateral, par or maturity value.	(D) Cost	(E) Current Value
	Fidelity Investments	Registered Investment Company FID ADV FREEDOM 2010 Z6 FUND	$ 0.00	$ 21.38
	Fidelity Investments	Registered Investment Company FID ADV FREEDOM 2015 Z6 FUND	$ 0.00	$ 653,583.03
	Fidelity Investments	Registered Investment Company FID ADV FREEDOM 2020 Z6 FUND	$ 0.00	$ 137,552.27
	Fidelity Investments	Registered Investment Company FID ADV FREEDOM 2025 Z6 FUND	$ 0.00	$ 4,743,164.85
	Fidelity Investments	Registered Investment Company FID ADV FREEDOM 2030 Z6 FUND	$ 0.00	$ 317,368.65
	Fidelity Investments	Registered Investment Company FID ADV FREEDOM 2035 Z6 FUND	$ 0.00	$ 2,928,649.63
	Fidelity Investments	Registered Investment Company FID ADV FREEDOM 2040 Z6 FUND	$ 0.00	$ 434,691.19
	Fidelity Investments	Registered Investment Company FID ADV FREEDOM 2045 Z6 FUND	$ 0.00	$ 2,081,912.21
	Fidelity Investments	Registered Investment Company FID ADV FREEDOM 2050 Z6 FUND	$ 0.00	$ 127,954.51
	Fidelity Investments	Registered Investment Company FID ADV FREEDOM 2055 Z6 FUND	$ 0.00	$ 623,371.73
	Fidelity Investments	Registered Investment Company FID ADV FREEDOM 2060 Z6 FUND	$ 0.00	$ 24,312.86
	Fidelity Investment	Registered Investment Company FIDELITY INSTL MM FDS GOVERNMENT	$ 234.60	$ 234.60
	Fidelity Investments	Registered Investment Company FIDELITY US BOND INDEX FUND	$ 0.00	$ 880,182.29
	First Pacific Advisors, LLC	Registered Investment Company FPA Crescent Fund	$ 0.00	$ 385,610.93
	JOHCM Funds	Registered Investment Company JOHCM INTERNTL SELECT I FUND	$ 0.00	$ 342,819.19

SCHEDULE H, line 4i - SCHEDULE OF ASSETS (HELD AT END OF YEAR)

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SCHEDULE H, line 4i - SCHEDULE OF ASSETS (HELD AT END OF YEAR)

F C F P, I. 401()
P
EIN 75 1054341
PLAN NUMBER 001
PLAN YEAR 10/01/2018 TO 09/30/2019

(A)	(B) Identity of issuer, borrower, lessor or similar party.	(C) Description of investment including maturity date, rate of interest, collateral, par or maturity value.	(D) Cost	(E) Current Value
*	Principal Global Investors Trust Co	Common/Collective Trust Morley Stable Value Fund	$ 0.00	$ 289,298.00
	MFS Investment Management	Registered Investment Company MFS Mass Inv Growth Stk R6 Fd	$ 0.00	$ 2,083,654.07
	MFS Investment Management	Registered Investment Company MFS US Govt Money Market Fund	$ 0.00	$ 2,088,920.82
*	Principal Funds Inc	Registered Investment Company Prin Diversified Real Asset R6	$ 0.00	$ 332,262.27
*	Principal Funds Inc	Registered Investment Company Prin Equity Income Inst Fund	$ 0.00	$ 2,099,970.39
*	Principal Funds Inc	Registered Investment Company Prin LgCap Growth I R6 Fund	$ 0.00	$ 3,229,880.97
*	Principal Funds Inc	Registered Investment Company Prin MidCap R6 Fund	$ 0.00	$ 2,684,723.70
	PRIMECAP Odyssey Funds	Registered Investment Company PRIMECAP ODYSSEY STOCK FUND	$ 0.00	$ 97,070.47
	The Royce Funds	Registered Investment Company Royce Total Return Inst Fund	$ 0.00	$ 703,971.52
	Franklin Templeton Investments	Registered Investment Company Templeton Global Bond R6 Fund	$ 0.00	$ 626,865.17
*	Participant Loans	Range of Interest Rates Rates Range From 6.25% To 6.25%	$ 0.00	$ 706,452.00

SCHEDULE H, line 4i - SCHEDULE OF ASSETS (HELD AT END OF YEAR)