



# Financial Services and Credit Guide

## Complete Financial Providence Group Pty Ltd



Version: 1a.0

Date prepared: 12 July 2023

Authorised Representative of

AMP Financial Planning Pty Limited

# About our practice

Complete Financial Providence Group is an experienced financial advice business where the owners and staff care about help you living your best life, the life you dream of? Your quality of life is important to us and through education and clear advice we commit to guiding you to your best life. Your future lifestyle is as important as your current lifestyle and supporting this in the future requires planning and forethought (the meaning of Providence) to acquire the necessary resources to fund your financial lifestyle when you chose to workless or retire.

We are also here for those that dream of a life with more than they have today, and we provide strategy and support to use leverage to acquire substantially more. For those of you with this desire we consider higher risk strategies to achieve greater returns.

Acquiring wealth or maintaining a financial lifestyle requires income and the protection of your wealth and financial lifestyle is imperative. It is our strong belief this needs to be as well planned as your accumulation strategy. We offer a range of solutions to protect your lifestyle.

“It’s not how much money you make, but how much money you keep, and how many generations you keep it for.” ~ Robert Kiyosaki

Complete Financial Providence Group Pty Ltd (ABN 91 114 284 230) trading as Complete Financial Providence Group is an Authorised Representative (Authorised Representative number 371168) and credit representative (Credit Representative number 371168) of AMP Financial Planning Pty Limited (“the Licensee”).

References to “our”, “we”, “us”, “me” and “I” refer to Complete Financial Providence Group

## Our office contact details

<b>Address</b>	Suite 4, 208 Whitehorse Road, , Blackburn , VIC 3130
<b>Phone</b>	03 90408500
<b>Fax</b>	03 90408555
<b>Email</b>	ncarmichael@cfpgoup.com.au
<b>Website</b>	www.cfpgroup.com.au

This Financial Services and Credit Guide (“Guide”) contains information that will help you decide whether to use the financial services we offer. It sets out:

- who we are and how to contact us
- the advice and services we provide
- information about the Licensee
- our fees and how we are paid in connection with those services
- how we manage your private information
- how you can complain about a matter relating to us

## Not Independent

Generally, we provide personal advice in line with the Licensee’s Approved Product and Services List (APSL) which may include financial products and services associated with the Licensee. We may receive commissions from life insurance products we recommend and non-monetary benefits such as training and educational seminars from product providers. For these reasons, we are not considered independent, impartial, or unbiased.

## Documents you may receive in the financial planning process

We will provide you with several documents as you progress through your financial planning and advice journey. We may provide these documents electronically to your nominated email address, unless otherwise agreed.

When we provide personal advice, it will normally be documented and provided to you in a Statement of Advice (SoA). The SoA contains a summary of your goals and the strategies and any financial products we may recommend to achieve your goals. It also provides you with detailed information about product costs and the fees and other benefits we and others will receive, as a result of our advice.

If we provide further personal advice an SoA may not be required. We will keep a record of any personal advice we provide you for seven years. You may request a copy of such records by contacting us during that period.

If we recommend or arrange a financial product for you, we will provide a Product Disclosure Statement (PDS), or Investor Directed Portfolio Services (IDPS) guide where relevant. These documents contain the key features of the recommended product, such as its benefits and risks, as well as the costs you will pay the product provider to manage that product. You should read any warnings in your advice document, the PDS or IDPS guide carefully before making any decision relating to a financial strategy or product.

## Our advice and services

We are authorised to provide personal or general financial advice on:

- Wealth Accumulation
- Personal insurance
- Superannuation strategies and retirement planning
- Retirement income streams, including pensions and annuities
- Budget and cash flow management
- Centrelink and other government benefits

We are authorised to provide advice on and arrange the following products:

- Superannuation
- Securities
- Retirement savings accounts
- Managed investment schemes including Investor Directed Portfolio Services (IDPS)
- Deposit and payment products, including basic deposit, non-basic deposit, and non-cash payment products
- Life Products – Investment life insurance
- Life Products – Life risk insurance (including life cover, income protection cover, total and permanent disability cover, and trauma cover)

Your adviser may also be authorised to advise on other specialist areas. These are listed in their adviser profiles.

## Transaction services

In limited circumstances, we can arrange financial product transactions for you on your instruction without providing personal advice.

## Instructing us

You can give us instructions by telephone, mail, email, or other methods, as agreed with your adviser.

## Providing information to us

It is important that we understand your circumstances and goals, so that we can provide you with appropriate advice and services. You have the right not to provide us with any personal information. Should you choose to withhold information, or if information you provide is incomplete or inaccurate, the advice or services we provide you may not be appropriate for you.

It is also important that you keep us up to date by informing us of any changes to your circumstances so we can determine if our advice is still appropriate.

## Credit services

In addition to financial services, we are also authorised to assist you with advising and implementing loan products and consumer leases.

### Credit documents you may receive

When we provide credit assistance, we will conduct a preliminary assessment to determine the suitability of a particular product. This is normally documented and provided to you in a Credit Proposal. We will retain this document and you may request it by contacting our office within seven years of the assessment. We will only provide recommendations to apply for a particular credit contract with a certain lender or increase the credit limit of a particular credit contract where the contract meets your needs and objectives and is not unsuitable to your circumstances.

### Lenders and lessors

The Licensee has a broad panel of lenders and lessors for your Accredited Mortgage Consultant (AMC) to choose from. The full list of approved lenders is available on request but is not an exhaustive list of lenders who offer credit of the nature you may seek.

As at September 2022, the lenders whose products are most commonly recommended by AMCs authorised by the Licensee are AFG Home Loans, NAB, Macquarie Bank, AMP Bank, Commonwealth Bank, ANZ

### Benefits we may receive from lenders and lessors

Subject to compliance with relevant laws, including relating to conflicted remuneration, lenders may offer incentives that are paid directly to the AMC. These may include indirect benefits, for example business lunches, tickets to sporting or cultural events, corporate promotional merchandise and other minor benefits.

### Credit reports and valuations

We may be provided access to free services such as credit reports and valuations from our lenders. Details of any relevant services we may receive because of a recommendation we make to you, will be included in the Credit Proposal we provide to you.

### Tiered Servicing Arrangements

Through your AMC's relationships with lenders, they may have access to tiered servicing arrangements. The benefits can include faster processing, better information or greater levels of assistance provided for obtaining loan approval. You will be advised of any tiered service arrangements that are in place with a particular lender that they have proposed at the time recommendations are made.

Access to these programs is not based solely on the volume of new or existing lending your AMC's customers have with each respective lender and does not entitle

them to any additional commissions outside of what they have disclosed to you, any additional payments or preferential customer discounts.

### Mortgage aggregators

Mortgage aggregators act as a gateway or interface between mortgage brokers and lenders by providing an IT platform through which brokers submit loan applications and deal with lenders. They also provide some ancillary services. We aggregate via Loan Market.

The aggregator may invite AMCs to conferences and professional development events to hear industry updates and educational presentations by the aggregator and lender sponsors. The aggregator may subsidise some attendance costs, subject to compliance with relevant laws. The value will depend upon a range of factors, including the nature of the courses and events planned. Any benefits that we may receive that are related to a loan recommended to you which is regulated by the National Consumer Credit Protection Act 2009 (Cth), will be disclosed in our advice to you prior to application.

## Privacy Collection Statement

We are committed to protecting your privacy and outline below how we maintain the privacy of the information we collect about you.

As part of the advice journey, we need to collect information about you. Where possible we will obtain that information directly from you, but if authorised by you we may also obtain it from other sources such as your employer or accountant. If that information is incomplete or inaccurate, this could affect our ability to analyse your needs, objectives and financial situation, so our recommendations may not be appropriate or suitable for you.

We are also required to implement client identification processes under the Anti-Money-Laundering and Counter-Terrorism Financing Act (AML/CTF) 2006. We will need you to present identification documents such as passports and driver's licenses to meet our obligations.

We keep your personal information confidential and only use it in accordance with the AMP Group (the Group) Privacy Policy. Some of the ways we may use this information are set out below:

- We and the Licensee may use this information to provide financial and/or credit advice and services to you;
- We may disclose your information to other financial advisers, brokers and those who are authorised by the Licensee to review clients' needs and circumstances from time to time, including other companies within the Group;
- Your information may be disclosed to external service suppliers both here and overseas who supply administrative, financial or other services to assist us and the Group to provide financial and/or credit advice and services to you. A list of countries where these service providers are located can be found in the Group Privacy Policy;
- We may be disclosing your personal information to approved external service providers located in India for the purpose of administration services.
- Your information may be used to provide ongoing information about opportunities that may be useful or relevant to your financial needs through direct marketing (you can opt-out at any time); and
- Your information may be disclosed as required or authorised by law and to anyone authorised by you.

We and the Licensee will continue to take reasonable steps to protect your information from misuse, loss, unauthorised access, modification or improper disclosure. You can request access to the information we or the Licensee holds about you at any time to correct or update it as set out in the Group Privacy Policy. The Group Privacy

Policy also contains information about how to make a privacy complaint. For a copy of the Group Privacy Policy visit <http://www.amp.com.au/privacy> or you can contact us.

## Confidence in the quality of our advice

If at any time you are not satisfied with our services, the following will help you understand your options and find a resolution.

- Contact your adviser and tell them about your complaint.
- Alternatively, you can contact the Licensee at:
  - Phone 1800 812 388
  - Email [advicecomplaints@amp.com.au](mailto:advicecomplaints@amp.com.au)
  - Online at [www.amp.com.au](http://www.amp.com.au)
  - In writing to:

### Attention: Advice Complaints Department

AMP Financial Planning Pty Limited

Level 25, 50 Bridge Street  
Sydney NSW 2000 Australia

They will try to resolve your complaint quickly and fairly. They will provide you with a decision about your complaint within 30 days of us receiving it.

We note that in some circumstances, it may not be possible for us to completely resolve a complaint within this timeframe. If you do not agree with our decision in respect of your complaint, or are otherwise unsatisfied with our response, you may escalate your complaint to one of the following External Dispute Resolution Schemes.

<b>Any issues about financial advice, investments, superannuation, insurance matters, or credit matters</b>	<b>Australian Financial Complaints Authority (AFCA)</b> GPO Box 3, Melbourne VIC 3001 1800 931 678 <a href="http://www.afca.org.au">www.afca.org.au</a> <a href="mailto:info@afca.org.au">info@afca.org.au</a>
<b>Any issue about your personal information</b>	<b>The Office of the Australian Information Commissioner</b> GPO Box 5218, Sydney NSW 2001 1300 363 992 <a href="http://www.oaic.gov.au">www.oaic.gov.au</a> <a href="mailto:enquiries@oaic.gov.au">enquiries@oaic.gov.au</a>

You may also contact the **Australian Securities & Investments Commission (ASIC)** on 1300 300 630 (free call info line) to make a complaint and obtain information about your rights.

## Professional indemnity insurance

We maintain professional indemnity insurance to cover our advice and the recommendations provided by your adviser. The Licensee is also covered by professional indemnity insurance and this satisfies the requirements

imposed by the Corporations Act 2001 and National Consumer Credit Protection Act. The insurance also covers claims arising from the actions of former employees or representatives of the Licensee, even where subsequent to these actions, they have ceased to be employed by or act for the Licensee.

price may be favourably affected by the sale of products issued by AMP Group companies.

## About the Licensee

AMP Financial Planning Pty Limited; ABN 89 051 208 327  
Australian Financial Services Licensee and Australian Credit Licensee; Licence No: 232706

Registered office is at 50 Bridge Street, Sydney NSW 2000 Australia.

The Licensee has:

- Approved the distribution of this Guide
- Authorised us to provide advice and other services as described in this Guide.

## About the AMP Group

The Licensee is a member of the AMP group of companies. We can provide advice on products and services from a wide range of financial product and service providers, some of which are related or associated with the Licensee, namely:

- National Mutual Funds Management Limited
- AMP Capital Investors Limited
- NMMT Limited
- SuperIQ Pty Limited
- N.M. Superannuation Pty Limited
- ipac asset management Limited
- AMP Bank Limited
- SMSF Administration Solutions Pty Limited

If we recommend a product issued by the AMP Group or a third party product issuer, they will benefit from our recommendation by receiving product, administration and investment fees, as well as fees paid by fund managers to distribute their product. These fees are all disclosed in the relevant PDS or IDPS guide.

The Licensee maintains an APSL, from a diversified selection of approved Australian and International fund providers, including companies related to the Licensee. These have been researched by external research houses as well as our in-house research team. The Licensee regularly reviews products and services to ensure they remain competitive with similar products that address similar client needs and objectives. Generally, we recommend products on the APSL. However, if appropriate for your needs, we may, subject to the Licensee's approval, recommend other products.

Authorised Representatives and/or staff employed in our business may hold shares in AMP Limited, whose share

## Our fees

We will discuss and agree the actual fees with you before we proceed and where relevant the fees and commissions will be disclosed in the advice document provided to you. The following section outlines the types of fees that may apply.

The fees charged for our advice and services may be based on a combination of a set dollar amount, or a percentage-based fee. Our agreed advice and service fees may include charges for one off or regular fees. We may also receive initial or ongoing commissions from certain product providers.

### Licensee fees

All permissible fees and commissions will be paid directly to the Licensee. It will then pass on the amounts due to us through its payment system. The Licensee charges us a Licensee Fee each year. The Licensee Fee is determined as an annual amount based on a number of factors, including our business revenue, the number of advisers and/or accredited mortgage consultants in the practice and a practice fee.

### Other costs

Other costs may apply in the process of providing our advice and services to you. We will agree all additional costs with you prior to incurring them.

The following table outlines the range of fee we charge and should be used as a guide only. We will discuss your individual needs and agree our fees with you. The actual agreed fees will depend on factors such as the complexity of your circumstances and goals and the scope of the advice. All fees and charges include GST.

Fee type & Description	
Initial or ad hoc fees	
Initial service	Fee amount
Initial Advice	Starting from \$2,500 to \$6,500
Additional Advice	Starting from \$2,500 to \$6,500
SMSF & Complex Advice	Starting from \$6,000 to \$10,200
ADHOC Service	If you have opted out of a Fixed Annual Service Agreement, we can assist you on an ADHOC basis at \$550 GST Inc per hour or you can enter into a New Fixed Annual Advice Service Agreement.
Annual advice and service fees	
Fixed Annual Advice Service Agreements - AAA	<p>Our Fixed Annual Advice Agreement is paid for a 12 month period.**</p> <p>Example:- You meet with your adviser on the 02/03/2021 and you enter in a 12 Month Fixed Annual Service Agreement.</p> <p>The Agreement will end on the 01/03/2022- During this period you will be offered An Annual Review of your situation, to ensure that you remain on track - and any changes will be made via production of a Statement of Advice or Record of Advice.</p> <p>You will have access to the Staff and Adviser during that period.</p> <p>We provide you with Newsletters, Information Links and Updates regarding Market and Economic Conditions, via email social media and our website.</p> <p>AAA - Range from \$2,750 to \$8,000 GST Included</p>

## Commissions

### Insurance:

**Initial commissions:** Up to 66% of the first year's premium for new policies implemented from 1 January 2020.

We may receive commissions on increases or additions to existing policies of up to 33%.

### **Ongoing commissions:**

Up to 33% of the insurance premium each following year.

**For example:** On insurance policies implemented from 1 January 2020, if your insurance premium was \$1,000, we would receive an initial commission of up to \$660. We would receive an ongoing commission of up to \$330 pa.

### Residential loans

**Initial commissions:** Up to 1.10% of the initial loan balance.

**Ongoing commissions:** Up to 0.55% of the outstanding loan balance each year.

**For example:** If your loan balance was \$100,000, initial commission would be up to \$1,100. The ongoing commission on a \$100,000 loan balance would be up to \$550.

### Personal loans

**Initial commissions:** Up to 8% of the initial loan balance (capped at \$4,000). Up to \$1,990 where a flat brokerage fee applies.

**For example:** If your loan balance was \$50,000 and a percentage-based fee applies, commission would be up to \$4,000.

### Deposit bonds

**Initial commissions:** Up to 25% of the deposit bond fee.

**For example:** If your deposit bond fee is \$400, the commission would be up to \$100.

### Other commissions

Explain the service and commission. If there is a range, insert the range. If percentage-based, insert a worked example.

professional development programs, offered annually to qualifying practices.

## Placement fees

From time to time the Licensee may receive fees from brokers or product issuers (including AMP group companies) for arranging client participation in Initial Public Offerings (IPOs) of financial products. The fee, which is generally a percentage of the fee paid to the broker, varies from offer to offer and by the level of participation by the Licensee. We may share in this fee based on the level of participation by our clients.

## Our Referral arrangements

We may receive payments to refer you to other service providers. These amounts do not involve additional costs and will be disclosed in your SoA. Our current referral arrangements are detailed below:

Provider	Services	Payment arrangement
Stockbroker approved by AMP Financial Planning	Advice and/ or execution of share/securities transactions	5% of any referral fees will be paid to AMP Financial Planning and we will receive the remaining 95%. For example, if the referral fee was \$1,000 AMP Financial Planning will receive \$50.00 and we will receive \$950.00

Where you have been referred to us by someone else, we may pay them a fee, commission or some other benefit in relation to that referral. Our current referral arrangements are detailed below:

## Other benefits we may receive

In addition to the payments explained above we may receive other monetary and non-monetary benefits, support services or recognition from the Licensee to help us grow our business. These are not additional costs to you. They could include training, badging rights, technology and technology support, marketing, financing, events or other recognition we are eligible for. We may receive benefits from product issuers that may include non-monetary benefits that are valued at less than \$300. We may also participate in business lunches or receive corporate promotional merchandise tickets to sporting or cultural events and other similar items.

From time to time, AMP Services Limited (ASL) may facilitate access to the Licensee and us to be trained and educated by product issuers on their products.

## Personal and professional development

The Licensee provides personal and professional development opportunities such as education and



Provider	Payment arrangement
Michael Boucher	<p>Clients are referred to Complete Financial Providence Group Pty Ltd for advice. 25% of any up-front commission or part of the fee for services paid by AMP Financial Planning Pty Ltd &amp; 25% of any ongoing commission paid by AMP Financial Planning Pty Ltd will be paid to Michael Boucher as a referral fee. Clients are also referred to Complete Financial Providence Group Pty Ltd for credit advice. 25% of any up-front commission or part of the fee for services paid by AMP Financial Planning Pty Ltd &amp; 25% of any ongoing commission paid by AMP Financial Planning Pty Ltd will be paid to Michael Boucher as a credit referral fee.</p> <ul style="list-style-type: none"> <li>For example, if we receive \$1,000 revenue we will pay \$250 upfront and ongoing referral fees to Michael Boucher.</li> </ul>

#### Separately managed accounts (SMA)

A separately managed account (SMA) is an account where a responsible entity, based on advice from a professional investment manager, can make investment decisions on a client's portfolio and transact on those decisions without requiring the client's express consent each time. This means the responsible entity is responsible for the discretionary management of the client's investment portfolio.

We distribute the Activator range SMA, which are administered by Macquarie Wrap.

We are not the investment manager and have no relationship or association with the investment manager.

The responsible entity appoints a professional investment manager to advise on the SMA portfolio's management. The responsible entity makes all investment decisions relating to the SMA portfolios.

For more information about how the product works and the roles and responsibilities of the key parties, please refer to the Macquarie Wrap SMA PDS which we provide to you if we recommend the SMA product to you.

#### Fees

Other than the fees disclosed under 'Our Fees' above, we do not receive any other remuneration in relation to Activus SMA.

#### Note

If you are no longer our client, the responsible entity may have the discretion to move your investments out of the Activus SMA.

#### ABNs and Australian financial services licences (AFSL)

<b>Responsible entity</b>	Macquarie Investment Services Limited ABN 73 071 745 401, AFSL 237495
<b>Investment manager</b>	Activus Investment Advisors Pty Ltd ABN 94 668 434 517, AFSL 001242380

## Financial and Credit Adviser Profiles

### About Austin Whiting



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Austin Whiting is an Authorised Representative (AR number 301611) and credit representative (CR number 409879) of the Licensee.

#### Contact details

Address	4/208 Whitehorse Road, Blackburn VIC 3130
Phone	03 9040 8500
Email	awhiting@cfpgroup.com.au

#### Advice and services I can provide

I am authorised to provide the services listed in the Our advice and services section of this Guide.

I am authorised to advise on and arrange the following specialist advice areas:

- Derivatives (Limited to advising on and dealing in derivative-related products approved by the licensee)

Background:

Austin began his professional life working in accounting, He enjoyed his work well enough, but his interactions with clients were principally about the past year – profit, loss and tax.

While he appreciated that this was a time of great learning, he looked to investments, superannuation, and other forward focused planning, where he could take a more active role in creating wealth for his clients. In the early 2000s he worked at JB Were and RBS Morgan's in financial planning, stockbroking and other more proactive roles until he felt ready to set out on his own. This he did in 2011.

Austin helps people understand their options so they can make better decisions on using their cashflow and assets to build wealth, secure their financial future and protect their lifestyle.

Austin works hard for every client. He believes that to work in the clients' best interests he must keep the lines of communication open, advise, yes, but also listen carefully, then guide and educate. He is similarly active outside the office. He swims, surfs, plays tennis and golf, and revels in family time.

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### Qualifications (Finance related)

Bachelor of Business (Accounting)

### Professional memberships

FAAA – Financial Advisers Association of Australia

CA – Chartered Accountants

### Professional Designations

CFP - Certified Financial Planner (FAAA)

CA – Chartered Accountants Australia and New Zealand

## How I am paid

I receive the following from our practice:

- salary
- dividends
- bonus
- equity in the practice
- share of revenue

Based on the above, the following contains my remuneration details:

- I am a Director/Shareholder/Employee of Complete Financial Providence Group Pty Ltd and receive a Salary, dividends and bonuses from the practice.



## About Nicholas Carmichael

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Nicholas Carmichael is an Authorised Representative (AR number 339009) and credit representative (CR number 393228) of the Licensee.

### Contact details

Address	4/208 Whitehorse Road, Blackburn VIC 3130
Phone	03 9040 8500
Email	ncarmichael@cfpgroup.com.au

### Advice and services I can provide

In addition to the services listed in the **Our advice and services** section of this guide, I am authorised to advise on and arrange the following specialist advice areas:

- Derivatives (Limited to advising on and dealing in derivative-related products approved by the licensee)

I am an Accredited Mortgage Consultant. As a credit representative of AMP Financial Planning, I am authorised to provide mortgage and finance broking activities, including advising and assisting you to implement loan products and consumer leases.

The full list of approved lenders is available on request but is not an exhaustive list of lenders who offer credit of the nature you may seek.

### Background:

Nick specialises in helping clients realise their financial goals and objectives and places great emphasis on debt management and protection of client's biggest asset their income. Without income there is no lifestyle, so it is the most important asset to protect.

"It's really the relationship between the client and the advisor that value adds, not so much the product or the solution. Through a relationship of trust, we can build something strong together. Financial freedom is the aim."

According to Nick, the school curriculum should include money management and wealth creation because too many people don't seriously consider financial planning until debt is scratching at their door. Young people fall in love, move in together and buy a house. Their first experience of financial planning is debt – their mortgage – then they have to start planning backwards. His motto is, 'It's never too late to start, but it's never too early to start either.'

Sitting down with people to find and quantify the positives in his clients' situations is the most challenging and rewarding part of Nick's job. He says, 'It's really the relationship between the client and the advisor that value adds, not so much the product or the solution. Through a relationship of trust, we can build something strong together.' Financial freedom is the aim. "

During Nicks' 23 years in the police force, he always had an interest in wealth accumulation because he knew he wanted a better post-work life than his superannuation would provide. He began to read books on goal setting and achievement, which led him to set goals in his own life. Often overhearing colleagues talking about their lives being controlled by lack of money, but none having a plan to relieve their financial problems or build future wealth, he decided he could guide

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people like this through setting and reaching their financial goals. He studied financial planning and has been living his passion ever since, and his clients are the beneficiaries.

The CFP family is Nick's place. His colleagues' ethics, commitment and working style mesh perfectly with his own. It's a strong team environment as each CFP adviser specialises in specific areas of financial planning. The company is able to offer targeted and knowledgeable service to clients at all ages and stages of their lives.

Outside of work, Nick's family is most important and spending time with his wife and 3 boys is where the most enjoyment comes. Nick also likes to play golf, watch sport, exercise and eat and drink good food and wine.

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#### **Qualifications (Finance related)**

Diploma of Financial Services (Finance/Mortgage Broking Management)

Diploma of Financial Services

#### **Professional memberships**

MFAA - Mortgage & Finance Association of Australia

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## The advice and services I can provide

### How I am paid

I receive the following from our practice:

- salary
- dividends
- bonus
- equity in the practice
- share of revenue

Based on the above, the following contains my remuneration details:

- I am a Director/Shareholder/Employee of Complete Financial Providence Group Pty Ltd and receive a Salary, dividends and bonuses from the practice.
-