

Item 1 Cover Page

Registered as: Planned Financial Services, LLC | CRD No. 112879
Doing Business As: Planned Financial Services
SEC File no: 801-110086



7000 Fitzwater Road, Suite 300 | Cleveland, Ohio 44141
Telephone (440) 740-0130 | Fax (440) 740-0339

PlannedFinancial.com

March 31, 2021

NOTICE TO PROSPECTIVE CLIENTS: PLEASE READ THIS DISCLOSURE BROCHURE IN ITS ENTIRETY

This brochure provides information about the qualifications and business practices of Planned Financial Services. If you have any questions about the contents of this brochure, please contact us at (440) 740-0130 Frank Fantozzi, Chief Compliance Officer, or e-mail Frank@Plannedfinancial.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Additional information about Planned Financial Services is also available on the SEC's website at www.AdviserInfo.sec.gov. Registration does not imply a certain level of skill or training.

Item 2 –Material Changes to ADV 2A

Since the last update of our ADV Part 2A was filed in April 2020, the following material changes have been made:

- Updated Item 4 – Description and approach to include additional detail relative to the services offered for individual and custodial consultation.
 - Firm management to properly account for Frank Fantozzi’s business time allocation.
 - Added reference to PFS Advisory Portfolios as an option under retirement plan consulting.
 - Assets under management as of December 31, 2020 as well as the addition of assets under advisement.
- Updated Item 5 –Advisory fee and compensation to accurately reflect the maximum advisory fee to the client.

In the future, this Item number will discuss only specific material changes that are made to the Brochure and provide clients with a summary of such changes.

We will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business’ fiscal year. We may further provide other ongoing disclosure information about material changes as necessary will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Disclosure Brochure may be requested by contacting us at (440) 740-0130 x221 and ask for Michelle Velotta. It can also be accessed on our website at any time at www.plannedfinancial.com (under the contact us link).

Additional information about Planned Financial Services is available on the SEC’s Web Site www.AdvisorInfo.sec.gov. The SEC’s Web Site also provides information about any persons affiliated with Planned Financial Services who are registered, or are required to be registered, as investment advisor representatives of Planned Financial Services.

Item 3 – Table of Contents

Item 1 Cover Page 1

Item 2 –Material Changes To ADV2A 2

Item 3 – Table of Contents 3

Item 4 – Advisory Business 4

Item 5 – Advisory Fees and Compensation 16

Item 6 – Performance-Based Fees and Side-by-side Management..... 18

Item 7 – Types of Clients 19

Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss..... 19

Item 9 – Disciplinary Information..... 24

Item 10 – Other Financial Industry Activities and Affiliations 24

Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading24

Item 12 – Brokerage Practices 25

Item 13 – Review of Accounts 26

Item 14 – Client Referrals and Other Compensation..... 27

Item 15 – Custody 27

Item 16 - Investment Discretion 28

Item 17 – Voting Client Securities 28

Item 18 – Financial Information 28

Item 4 – Advisory Business

Planned Financial Services – Description & Approach

Planned Financial Services was formed in 1994 to provide asset management and brokerage services through WS Griffith Securities and was registered to provide financial planning, tax, and other financial services. In 2004, the Firm changed their broker-dealer and asset management services from WS Griffith Services to LPL Financial¹. In 2016, Planned Financial Services modified its registration to offer asset management services under its own ADV. Planned Financial Services will continue to use LPL Financial as the qualified custodian for the safekeeping of client assets and as the broker/dealer for securities transactions. However, Planned Financial Services will not be limited to LPL Financial for custodianship of advisory assets.

In February 2017, the firm filed to become a registered with the US Securities and Exchange Commission.

Planned Financial Services provides personalized, confidential financial and tax planning with our asset management services to individuals, pension and profit-sharing plans, trusts, estates, charitable organizations, and businesses. Advice is provided through consultation with the client to align their actions with their goals and values. Our consultation may include, but is not necessarily limited to:

Individual Consultation

- Determination of personal and financial objectives
- Investment asset management
- Family office services
- Identification of financial challenges
- Cash flow management
- Tax preparation and planning
- Insurance review and recommendations
- Investment research, evaluation, and recommendations
- Education/college funding
- Retirement planning
- Estate planning
- Case studies
- Multiple financial and investment outcome scenarios
- Business opportunities and evaluation

Corporate Consultation

- Institutional asset management
- Defined Contribution and defined benefit planning
- Determination of personal and financial objectives
- Identification of financial challenges
- Business succession planning
- Buy sell consultation and insurance funding
- Business opportunities and evaluation

An initial meeting is recommended to see if a prospective client is a good fit to collaborate together and to determine the scope of services that may be beneficial to a particular client. After our meeting, Planned Financial Services will provide a Client Engagement Agreement which will outline mutual expectations and deliverables and the associated advisory fees. Other recommended professionals (e.g., lawyers, accountants, property, and casualty agents, etc.) are engaged directly by the client on an as-needed basis.

Firm Management

Frank Fantozzi is the founder and sole owner of Planned Financial Services, LLC. He has also been an LPL branch manager since 2004. Mr. Fantozzi has a BA in Accounting with a Minor in Finance from Case Western Reserve University and a Master's Degree in Taxation from the University of Illinois. Mr. Fantozzi also holds the following professional designations:

- Certified Divorce Financial Analyst (CDFA)
- Accredited Investment Fiduciary (AIF®)
- Personal Financial Specialist (PFS)

Mr. Fantozzi spends approximately 75% of his time focused on advisory business, 22% on firm management, 1% of his time focused on brokerage business, and approximately 2% of his time on insurance business. Frank serves as the Chief Compliance Officer.

Asset Management

Planned Financial Services provides discretionary (with permission) fee-based investment advisory services for compensation primarily to individual clients and high-net worth individuals as well as businesses. The individuals associated with Planned Financial Services are appropriately licensed, credentialed, and authorized to provide advisory services on behalf of Planned Financial Services.

Individuals associated with Planned Financial Services are also registered representatives of LPL Financial. Any securities transactions executed by investment advisor representatives of Planned Financial Services are done so in their capacity as a registered representative of LPL Financial and shall be directed to LPL Financial for execution.

Investment advisor representatives provide advice on the purchase and sale of various types of investments, such as, but not limited to, mutual funds, exchange-traded funds ("ETFs"), variable annuity subaccounts, real estate investment trusts ("REITs"), equities, structured products, and fixed income securities. The advice is tailored to the individual needs of the client based on the client's investment objective and financial goals. Accounts are reviewed on a regular basis and rebalanced, as necessary, according to each client's investment profile. Any and all material conflicts of interest are disclosed herein.

- A conflict exists between the interests of the investment advisor and the interests of the client.
- The client is under no obligation to act upon the investment advisor's recommendation.
- If the client elects to act on any of the recommendations, the client is under no obligation to affect the transaction through the investment advisor.

Such conflicts are mitigated by an investment advisor representative's fiduciary duty to act in the best

interest of their client.

Wrap Fee Program

A wrap fee program is an advisory program under which a single fee, not based directly upon transactions in a client's account, is charged for investment advisory services (which may include portfolio management or advice concerning the selection of other investment advisors) and the execution of client transactions. Planned Financial Services does not currently sponsor nor act as the portfolio manager of a wrap fee program.

Strategic Wealth Management (SWM I)

Planned Financial Services, through its investment advisor representatives, provides ongoing investment advice and asset management for a client's custodial Strategic Wealth Management (SWM) accounts held at LPL Financial. Strategic Wealth Management is the name of the custodial account offered through LPL Financial to support investment advisory services provided by Planned Financial Services. More specific account information and acknowledgements are further detailed in the account opening documents.

Strategic Wealth Management (SWM) is the name of a custodial account offered through LPL Financial to support investment advisory services provided by Planned Financial Services. Within a SWM account, investment advisor representatives provide advice on the purchase and sale of various types of investments, such as, but not limited to, mutual funds, exchange-traded funds ("ETFs"), variable annuity subaccounts, real estate investment trusts ("REITs"), equities, fixed income securities, options, and structured products, among others. The advice is tailored to the individual needs of the client based on the client's investment objective and financial goals. Accounts are reviewed on a regular basis and rebalanced, as necessary, according to each client's investment profile. More specific account information and acknowledgements are further detailed in the account opening documents.

Optimum Market Portfolios Program (OMP)

The Optimum Market Portfolios (OMP) program offers clients the ability to participate in a professionally managed asset allocation program designed by LPL Financial. There are up to six Optimum Funds that may be purchased within an OMP Account:

- Optimum Large Cap Growth Fund
- Optimum Large Cap Value Fund
- Optimum Small-Mid Cap Growth Fund
- Optimum Small-Mid Cap Value Fund
- Optimum International Fund
- Optimum Fixed Income Fund

Planned Financial Services will obtain the necessary financial information from each client and then select the proper fund portfolio program. While Planned Financial Services selects the proper portfolio program, LPL Financial will manage the underlying Optimum Funds on a discretionary basis consistent with the portfolio program objectives. LPL Financial does not directly manage fund assets on behalf of any particular client.

LPL Financial follows an asset allocation investment style in constructing portfolios for the Program. Asset allocation methodology is implemented by combining investments representing various asset classes that react differently to varying market conditions. Thus, if one asset class reacts negatively to certain market events, the potential exists for another asset class to react positively. As with any

investment strategy, there is no guarantee that the use of an asset allocation strategy will produce favorable results.

Planned Financial Services is responsible for educating clients about this investment style in advance of opening the Account by explaining the various asset classes (e.g., large cap growth, large cap value, etc.) being used within the selected portfolio. This educational process continues throughout the time that the client maintains the Account.

OMP enables advisors of Planned Financial Services to manage client assets through diversified asset allocation models, professional money management, automatic rebalancing, and online marketing and sales support.

Guided Wealth Portfolios (GWP)

GWP offers clients the ability to participate in a centrally managed, algorithm-based investment program, which is made available to users and clients through a web-based, interactive account management portal (“Investor Portal”). Investment recommendations to buy and sell open-end mutual funds and ETFs are generated through proprietary, automated, computer algorithms (collectively, the “Algorithm”) of Xulu, Inc., doing business as FutureAdvisor (“FutureAdvisor”), based upon model portfolios constructed by LPL Financial and selected for the account as described below (such model portfolio selected for the account, the “Model Portfolio”). Communications concerning GWP are intended to occur primarily through electronic means (including but not limited to, through email communications or through the Investor Portal), although Planned Financial Services will be available to discuss investment strategies, objectives, or the account in general in person or via telephone.

A preview of the Program (the “Educational Tool”) is provided for a period of up to forty-five (45) days to help users determine whether they would like to become advisory clients and receive ongoing financial advice from LPL Financial, FutureAdvisor and Planned Financial Services by enrolling in the advisory service (the “Managed Service”). The Educational Tool and Managed Service are described in more detail in the GWP Program Brochure. Users of the Educational Tool are not considered to be advisory clients of LPL Financial, FutureAdvisor or Planned Financial Services, do not enter into an advisory agreement with LPL Financial, FutureAdvisor or Planned Financial Services, do not receive ongoing investment advice or supervisions of their assets, and do not receive any trading services.

A minimum account value of \$5,000 is required to enroll in the Managed Service.

Features of the Educational Tool

Users of the Educational Tool (each, a “user”) agree to the terms of use (“Terms of Use”) and complete an Investor Profile. An investment objective (“Investment Objective”) and Model Portfolio is assigned to each user based upon factors in the Investor Profile, including risk tolerance and the number of years remaining until the age of retirement (such time being referred to herein as the “Retirement Age”). See description in “Features of the Managed Service” below for information regarding the design of the Model Portfolios. Based on the Investment Objective and Model Portfolio, the Educational Tool generates sample analysis, advice, and investment recommendations (“Sample Recommendations”).

The Educational Tool provides Sample Recommendations that may assist users in determining whether to utilize this Managed Service. Access to the Educational Tool is limited to a period of forty-five (45) days. The Educational Tool is intended to be used for educational and informational purposes only. The Educational Tool does not provide comprehensive financial planning and is not intended to constitute legal, financial or tax advice. There may be other relevant factors and financial considerations (e.g., debt load or financial obligations) that LPL Financial, FutureAdvisor and Planned Financial Services do not take into consideration in formulating any Sample Recommendations provided. The

Sample Recommendations made are meant solely as a sample of the types of recommendations available through the Managed Service. LPL Financial, FutureAdvisor and Planned Financial Services are not responsible for any actions taken with respect to the Sample Recommendations, and users are solely responsible for making their own investment decisions. The Educational Tool is only one of many tools that users may use as part of a comprehensive investment analysis process. Users should not rely on the Educational Tool as the sole basis for investment decisions.

Although LPL Financial is an investment advisor and broker-dealer registered with the SEC and a member of the Financial Industry Regulatory Authority (FINRA), and FutureAdvisor is an investment advisor registered with the SEC, in providing access to the Educational Tool, LPL Financial, FutureAdvisor and Planned Financial Services, an investment advisor registered with the SEC, do not intend to establish an advisory relationship, or in the case of LPL Financial, a brokerage relationship, with users of the Educational Tool. Users are not charged an advisory fee or any other fee or expense to use the Educational Tool. The scope of any investment advisory relationship with LPL Financial, FutureAdvisor and Planned Financial Services begins when users enroll in the Managed Service. The output that users receive by using the Educational Tool, including the Sample Recommendations, may differ materially from the advice users would receive as an advisory client of LPL Financial, FutureAdvisor and Planned Financial Services.

None of LPL Financial, FutureAdvisor or Planned Financial Services provides ongoing investment management or trading services for assets of users of the Educational Tool, makes any determination as to whether the website through which the Program is accessed or the Educational Tool is appropriate for any user, can access any assets in any accounts users aggregate in the Educational Tool, places any trades on behalf of users of the Educational Tool, or provides ongoing supervision of assets of users of the Educational Tool. The Sample Recommendations provided are intended as an informational preview of the Managed Service, and the Sample Recommendations are being provided to demonstrate the types of analysis, advice and recommendations provided by the Managed Service.

Features of the Managed Service

Investors participating in the Managed Service (each, a “client”) complete an account application (the “Account Application”) and enter into an account agreement (the “Account Agreement”) with LPL Financial, Planned Financial Services and FutureAdvisor. As part of the account opening process, clients are responsible for providing complete and accurate information regarding, among other things, their age, risk tolerance, and investment horizon (collectively, “Client Profile”). LPL Financial, Planned Financial Services and FutureAdvisor rely on the information in the Client Profile in order to provide services under the Program, including but not limited to, determination of suitability of the Program for clients and an appropriate investment objective and Model Portfolio for clients. The Model Portfolios have been designed and are maintained by LPL Financial or, in the future, a third-party investment strategist (as applicable, the “Portfolio Strategist”) and shall include a list of securities holdings, relative weightings and a list of potential replacement securities for tax harvesting purposes. None of the clients, Planned Financial Services or FutureAdvisor can access, change, or customize the Model Portfolios. Only one Model Portfolio is permitted per account.

Based upon a client’s risk tolerance as indicated in the Client Profile, the client is assigned an investment allocation track (currently Fixed Income Tilt, Balance Tilt or Equity Tilt), the purpose of which is to slowly rotate the client’s equity allocation to fixed income over time. LPL Research created these tracks using academic research on optimal retirement allocations, the industry averages as calculated by Morningstar for the target date fund universe, and input from FutureAdvisor.

Within the applicable allocation track and based upon a client’s chosen Retirement Age in the Client Profile, the client will be assigned a Model Portfolio and one of five of LPL Financial’s standard investment objectives:

- *Income with capital preservation.* Designed as a longer-term accumulation account, this investment objective is considered generally the most conservative. Emphasis is placed on generation of current income with minimal risk of capital loss. Lowering the risk generally means lowering the potential income and overall return.
- *Income with moderate growth.* This investment objective emphasizes generation of current income with a secondary focus on moderate capital growth.
- *Growth with income.* This investment objective emphasizes modest capital growth with some focus on generation of current income.
- *Growth.* This investment objective emphasizes achieving high long-term growth and capital appreciation. There is little focus on generation of current income.
- *Aggressive growth.* This investment objective emphasizes aggressive growth and maximum capital appreciation, with no focus on generation of current income. This objective has a very high level of risk and is for investors with a longer timer horizon.

Both the client and Planned Financial Services are required to review and approve the initial Investment Objective. As a client approaches the Retirement Age, the Algorithm will automatically adjust the client's asset allocation. Any change to the Investment Objective directed by a client due to changes in the Client's risk tolerance and/or Retirement Age will require written approval from the client and Planned Financial Services before implementation. Failure to approve the change in Investment Objective may result in a client remaining in a Model Portfolio that is no longer aligned with the applicable Client Profile. The Investment Objective selected for the account is an overall objective for the entire account and may be inconsistent with a particular holding and the account's performance at any time and may be inconsistent with other asset allocations suggested to client by LPL Financial, Planned Financial Services or FutureAdvisor prior to client entering into the Account Agreement. Achievement of the stated investment objective is a long-term goal for the account, and asset withdrawals may impair the achievement of client's investment objectives. A Client Profile that includes a conservative risk tolerance over a long-term investment horizon may result in the selection of an Investment Objective that is riskier than would be selected over a shorter-term investment horizon. Clients should contact Planned Financial Services if they believe the Investment Objective does not appropriately reflect the Client Profile, such as their risk tolerance.

By executing the Account Agreement, clients authorize LPL Financial, Planned Financial Services and FutureAdvisor to have discretion to buy and sell only open-end mutual funds ("Mutual Funds") and exchange-traded funds ("ETFs") (collectively, "Program Securities") according to the Model Portfolio selected and, subject to certain limitations described in the Account Agreement, hold or liquidate previously purchased non-model securities that are transferred into the account ("Legacy Securities"). In order to be transferred into an account, Legacy Securities must be Mutual Funds with which LPL Financial has a full or partial selling agreement, ETFs or individual U.S. listed stocks. Securities that are not Program Securities included within the Model Portfolio will not be purchased for an account, and FutureAdvisor, in its sole discretion, will determine whether to hold or sell Legacy Securities, generally, but not solely, with the goal of optimizing tax impacts for accounts that are subject to tax. Additional Legacy Securities will not be purchased for the account. Clients may not impose restrictions on liquidating any Legacy Securities for any reason. Clients should not transfer in Legacy Securities that they are not willing to have liquidated at the discretion of FutureAdvisor.

In addition, uninvested cash may be invested in money market funds, the Multi-Bank Insured Cash Account ("ICA") or the Deposit Cash Account ("DCA"), as applicable, as described in the Account Agreement. Dividends paid by the Program Securities in the account will be contributed to the cash allocation and ultimately reinvested into the account based on the Model Portfolio once the tolerance within cash allocation is surpassed.

Pursuant to the Account Agreement, FutureAdvisor is authorized to perform tax harvesting when deemed acceptable by the Algorithm. None of the clients, Planned Financial Services or LPL Financial can alter trades made for tax harvesting purposes. In order to permit trading in a tax-efficient manner, the Account Agreement also grants FutureAdvisor the authority to select specific tax lots when

liquidating securities within the account. Although the Algorithm attempts to achieve tax efficiencies, by doing so the client's portfolio may not directly align with Model Portfolio. As a result, the client may receive advice that differs from the advice received by accounts using the same Model Portfolio, and the client's account may perform differently than other accounts using the same Model Portfolio.

During the term of the Account Agreement, FutureAdvisor will perform a daily review of the account to determine if rebalancing is appropriate based on tolerance thresholds established by LPL Financial and/or FutureAdvisor. At each rebalancing review, the account will be rebalanced if at least one of the account positions is outside such thresholds, subject to a minimum transaction amount established by LPL Financial and/or FutureAdvisor. In addition, LPL Financial and/or FutureAdvisor may review the account for rebalancing in the event that the Portfolio Strategist changes a Model Portfolio. FutureAdvisor may delay placing rebalancing transactions for non-qualified accounts by a number of days, to be determined by FutureAdvisor, in an attempt to limit short-term tax treatment for any position being sold. In addition, trading in the account at any given time is also subject to certain conditions, including but not limited to, conditions related to trade size, compliance tests, the target cash allocation and allocation tolerances. None of the clients, Planned Financial Services or LPL Financial can alter the rebalancing frequency.

Selection of FutureAdvisor as Third-Party Robo Advisor

Diligence and reasons why Planned Financial Services selected GWP rather than another robo product/partner. Under Planned Financial Services agreement with LPL Financial, Planned Financial Services was provided the opportunity to offer GWP, which utilizes FutureAdvisor's Algorithm as described herein, to prospective clients. Planned Financial Services is not otherwise affiliated with FutureAdvisor. **Affiliation and any conflicts:** FutureAdvisor is compensated directly by LPL Financial for its services, including the Algorithm and related software, through an annual sub-advisory fee (tiered based on assets under management by FutureAdvisor, at a rate ranging from 0.10% to 0.17%). As each asset tier is reached, LPL Financial's share of the compensation shall increase and clients will not benefit from such asset tiers. No additional fee is charged for FutureAdvisor's services.

Planned Financial Services believes that certain clients who would not qualify for traditional ongoing investment advisory services, will benefit from GWP's advisor-enhanced advisory services, particularly due to the relatively low minimum account balance and the combination of a digital advice solution with access to an advisor. Unlike direct-to-consumer robo platforms, Planned Financial Services is responsible on an ongoing basis as investment advisor and fiduciary for the client relationship, including for recommending the program for the client; providing ongoing monitoring of the program, the performance of the account, the services of LPL Financial and FutureAdvisor; determining initial and ongoing suitability of the program for the client; reviewing clients' suggested portfolio allocations; reviewing and approving any change in Investment Objective due to changes clients make to their Client Profile; answering questions regarding the program, assisting with paperwork and administrative and operational details for the account; and being available to clients to discuss investment strategies, changes in financial circumstances, objectives or the account in general in person or via telephone. Planned Financial Services can also recommend other suitable investment programs if clients have savings goals or investment needs for which GWP is not the optimal solution.

Fees for LPL Financial Advisory Programs

The account fee charged to the client for each LPL Financial advisory program is negotiable, subject to the following maximum account fees:

| | |
|-----------------------|--------|
| Manager Access Select | 2.5% |
| OMP | 2.5% |
| GWP | 1.35%* |

* GWP Managed Service clients are charged an account fee consisting of an LPL Financial program fee of 0.35% and an advisor fee of up to 1.00%. In the future, a strategist fee may apply. However, LPL Financial Research currently serves as the sole portfolio strategist and does not charge a fee for its services. FutureAdvisor is compensated directly by LPL Financial for its services, including the Algorithm and related software, through an annual sub-advisory fee (tiered based on assets under management by FutureAdvisor, at a rate ranging from 0.10% to 0.17%). As each asset tier is reached, LPL Financial's share of the compensation shall increase and clients will not benefit from such asset tiers.

The GWP Educational Tool provides access to sample recommendations at no charge to users. However, if users decide to implement sample recommendations by executing trades, they will be charged fees, commissions, or expenses by the applicable broker or advisor, as well as underlying investment fees and expenses. Account fees are payable quarterly in advance.

Excluding GWP, LPL Financial serves as program sponsor, investment advisor and broker-dealer for the LPL Financial advisory programs. In the Managed Service of GWP, LPL Financial is appointed by each client as custodian of account assets and broker-dealer with respect to processing securities transactions for the accounts. In general, FutureAdvisor, in its capacity as investment advisor, will submit transactions through LPL Financial; however, FutureAdvisor may choose to execute transactions through a broker-dealer other than LPL Financial, subject to its duty to seek to achieve best execution. When securities transactions are effected through LPL Financial, there are no brokerage commissions charged to the account. If FutureAdvisor chooses to execute a transaction through a broker-dealer other than LPL Financial, the execution price may include a commission or fee imposed by the executing broker-dealer. In evaluating whether to execute a trade through a broker-dealer other than LPL Financial, FutureAdvisor will consider the fact that the account will not be charged a commission if the transaction is effected through LPL Financial.

Planned Financial Services and LPL Financial may share in the account fee and other fees associated with program accounts. Associated persons of Planned Financial Services may also be registered representatives of LPL Financial.

Potential Conflicts of Interest

Advisor receives compensation as a result of a client's participation in an LPL Financial program. Depending on, among other things, the type and size of the account, type of securities held in the account, changes in its value over time, the ability to negotiate fees or commissions, the historical or expected size or number of transactions, and the number and range of supplementary advisory and client-related services provided to the client, the amount of this compensation may be more or less than what Planned Financial Services would receive if the client participated in other programs, whether through LPL Financial or another sponsor, or paid separately for investment advice, brokerage and other services.

The account fee may be higher than the fees charged by other investment advisors for similar services. For instance, FutureAdvisor offers direct-to-consumer services similar to GWP. Therefore, clients could generally pay a lower advisory fee for algorithm-driven, automated ("robo") investment advisory services through FutureAdvisor or other robo providers. However, clients using such direct robo services will forgo opportunities to utilize LPL Financial -constructed model portfolios or to work directly with a financial advisor.

Clients should consider the level and complexity of the advisory services to be provided when considering the account fee (or the advisor fee portion of the account fee, as applicable) with Planned Financial Services. With regard to accounts utilizing third-party portfolio managers under aggregate, all-in-one account fee structures, because the portion of the account fee retained by Planned Financial Services varies depending on the portfolio strategist fee associated with a portfolio, Planned Financial

Services may have financial incentive to select one portfolio instead of another portfolio.

Manager Access Select Program (MAS)

Manager Access Select provides clients access to the investment advisory services of professional portfolio management firms for the individual management of client accounts. Advisor will assist client in identifying a third-party portfolio manager (Portfolio Manager) from a list of portfolio managers made available by LPL. The portfolio manager manages client's assets on a discretionary basis. Advisor will provide initial and ongoing assistance regarding the portfolio manager selection process.

Manager Access Network Program (MAN)

Manager Access Network enables high-net-worth investors to access a variety of institutional portfolio managers at significantly lower account minimums. By using separate account managers, clients can enjoy a higher level of specialization and service through the ownership of individual securities. A broad range of portfolio managers and multiple investment styles are available, including equity, fixed income, asset classes, mutual funds, ETFs, and specialty strategies. Clients contract directly with the portfolio managers for discretionary asset management services. LPL Financial provides brokerage, custodial, and administrative services to clients. Due diligence and portfolio monitoring is not provided by LPL Research.

Retirement Plan Consulting

Investment advisor representatives of Planned Financial Services may assist clients that are trustees or other fiduciaries to retirement plans ("Plans") by providing fee-based consulting and/or advisory services. Investment advisor representatives may perform, but not limited to, the following services:

- **Fiduciary Protection** - The benefits we bring in the capacity of Accredited Investment Fiduciaries are two-fold. Not only does Planned Financial Services help protect the Plan Sponsor and Trustees in their roles as fiduciaries, but we help the plan become more effective by improving the integrity of the plan process. This creates better outcomes for your plan participants. The plan will be revenue neutral and fully transparent to the Plan Sponsor and Employees.
- **Employee Education** - Help employees make more informed decisions. This will be achieved by well-thought-out and customized group meetings combined with 401(k) Days allowing employees to meet with our team of advisors face-to-face in a one-on-one format.
- **Risk Based Portfolios Allocation** – Planned Financial Services can help to determine the overall level of risk participants are willing to take on.
- **PFS Advisory Portfolios** – If the retirement plan allows, Planned Financial Services can provide its own PFS Strategic Portfolios, a risk-based asset allocation portfolio using investments available through that specific custodian, as an investment option for plan participants to use that are managed by Planned Financial Services on a discretionary basis.
- **Portfolio Asset Allocation** - Actively manage portfolios to help manage the overall portfolio risk and volatility.
- **Customized Electronic Vaulting** - All critical plan information such as plan documents, investment reporting, employee surveys, ERISA notices, and any other information deemed

critical to the plan are maintained in an electronic vault providing all trustees and fiduciaries with 24/7 access.

- **Investment Policy Statement (IPS)** - Assistance in the preparation or review of an IPS for the Plan based upon consultation with the Client to ascertain the Plan's investment objectives and constraints.
- **Plan Liaison** - Acting as a liaison between the Plan and service providers, product sponsors and/or vendors.
- **Ongoing Monitoring** – Monitor the investment manager(s) or investments in relation to the criteria specified in the Plan's IPS or other written guidelines provided by the Client.
- **Performance Reporting** - Preparation of reports describing the performance of Plan investment manager(s) or investments, as well as comparing the performance to benchmarks.
- **Recommendations** - Ongoing recommendations, for consideration and selection by the Client, about specific investments to be held by the Plan or, in the case of a participant-directed Defined Contribution Plan, to be made available as investment options under the Plan.
- **Education or training** for the members of the Plan investment committee with regard to various matters, including plan features, retirement readiness matters, service on the committee, and fiduciary responsibilities.
- **Enrollment Assistance** - Assistance in enrolling Plan participants in the Plan, including conducting an agreed upon number of enrollment meetings. As part of such meetings, Investment Advisor Representatives ("IARs") may provide participants with information about the Plan, which may include information on the benefits of Plan participation, the benefits of increasing Plan contributions, the impact of pre-retirement withdrawals on retirement income, the terms of the Plan and the operation of the Plan.

If the Plan makes available publicly traded employer stock ("company stock") as an investment option under the Plan, IARs do not provide investment advice regarding company stock and are not responsible for the decision to offer company stock as an investment option. In addition, if participants in the Plan may invest the assets in their accounts through individual brokerage accounts, a mutual fund window, or other similar arrangement, or may obtain participant loans, IARs do not provide any individualized advice or recommendations to the participants regarding these decisions.

In addition, if the client elects to engage an IAR to perform ongoing investment monitoring and ongoing investment recommendation services to a Plan subject to ERISA in the client agreement, such services will constitute "investment advice" under Section 3(21)(A)(ii) of ERISA. Therefore, the IARs will be deemed a "fiduciary" as such term is defined under Section 3(21)(A)(ii) of ERISA in connection with those services. Clients should understand that to the extent the investment advisor representative is engaged to perform services other than ongoing investment monitoring and recommendations, those services are not "investment advice" under ERISA and therefore, the IAR will not be a "fiduciary" under ERISA with respect to those other services.

From time to time the investment advisor representative may make the Plan or Plan participants aware of and may offer services available that are separate and apart from the services provided under

Retirement Plan Consulting. Such other services may be services to the Plan, to a client with respect to client's responsibilities to the Plan and/or to one or more Plan participants. In offering any such services, the investment advisor representative is not acting as a fiduciary under ERISA with respect to such offering of services. If any such separate services are offered to a client, the client will make an independent assessment of such services without reliance on the advice or judgment of the IAR. Such service may include:

- Assistance with investment education seminars and meetings for Plan participants. Such meetings may be on a group or individual basis and may include information about the investment options under the Plan (e.g., investment objectives, risk/return characteristics, and historical performance), investment concepts (e.g., diversification, asset classes, and risk and return), and how to determine investment time horizons and assess risk tolerance. Such meetings do not include specific investment advice about investment options under the Plan as being appropriate for a particular participant.
- Assistance at client's direction in making changes to investment options under the Plan.
- As part of the ongoing investment recommendation service set out above, assistance in identifying investment options in connection with the "broad range" requirement of Section 404(c) of the Employee Retirement Income Security Act of 1974 ("ERISA").
- As part of the ongoing investment recommendation service set out above, assistance in identifying an investment fund product or model portfolio in connection with the definition of a "Qualified Default Investment Alternative" ("QDIA") under ERISA.
- Assistance with the preparation, distribution and evaluation of Request for Proposals, finalist interviews, and conversion support in connection with vendor analysis and service provider support.
- Preparation of comparisons of Plan data (e.g., regarding fees and services and participant enrollment and contributions) to data from the Plan's prior years and/or a benchmark group of similar plans.
- Assistance in identifying the fees and other costs borne by the Plan for, as specified by client, investment management, recordkeeping, participant education, participant communication and/or other services provided with respect to the Plan.

Financial Planning Services

Planned Financial Services, through its investment advisor representatives, can provide personal financial planning and wealth management services tailored to the individual needs of each client and may include all their retirement and/or non-retirement account(s) regardless of where the assets are custodian. A financial plan is designed to help the client with all aspects of financial planning without ongoing investment management once the financial plan is completed.

The financial plan may include, but is not limited to, a net worth statement, a cash flow statement with recommendations, a review of investment accounts(including reviewing asset allocation and providing repositioning recommendations), strategic tax planning, a review of retirement accounts and plans including recommendations(and if necessary, one or more retirement scenarios), a review of insurance policies and recommendations for changes , estate planning review and recommendations, business planning with recommendations and education planning with funding recommendations.

Such services may be included as part of a comprehensive asset management engagement or provided separately for a separate fee. Fees for such services are negotiable and detailed in the client agreement. The financial plan may include generic recommendations as to general types of investment products or specific securities which may be appropriate for the client to purchase given his/her financial situation and objectives. The client is under no obligation to act upon the investment advisor's recommendation or purchase such securities.

Hourly Consulting Services

Planned Financial, through its investment advisor representatives, may provide consulting services including, as selected by the client in the consulting agreement: advice regarding tax planning, investment planning, retirement planning, estate planning, cash flow/budget planning, business planning, education planning, and personal financial planning. The services consider information collected from the client such as financial status, investment objectives and tax status, among other data. The investment advisor representatives may or may not deliver to the client a written analysis or report as part of the services. The investment advisor representatives tailor the hourly consulting services to the individual needs of the client based on the investment objective chosen by the client. The engagement terminates upon final consultation with the client. Fees for such services are detailed in the client agreement. A client may choose not to act on any of the recommendations.

Conflicts of Interest

- A conflict exists between the interests of the investment advisor and the interests of the client.
- The client is under no obligation to act upon the investment advisor's recommendation.
- If the client elects to act on any of the recommendations, the client is under no obligation to affect the transaction through the investment advisor.

Such conflicts are mitigated by an investment advisor representative's fiduciary duty to act in the best interest of their client.

Other Considerations

Neither Planned Financial Services nor any investment advisor representative are registered or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or a representative of the foregoing.

As of December 31, 2020, Planned Financial Services has \$264,495,127 of discretionary assets and \$35,039,219 of non-discretionary assets under management. In addition to the non-discretionary retirement assets under management, Planned Financial Services has \$165,461,672 of retirement assets under advisement.

A Client may terminate any of the aforementioned agreements at any time by notifying Planned Financial Services in writing and paying the rate for the time spent on the investment advisory engagement prior to notification of termination. If the client made an advance payment, Planned Financial Services will refund any unearned portion of the advance payment.

Planned Financial Services may terminate any of the aforementioned agreements at any time by notifying the client in writing. If the client made an advance payment, Planned Financial Services will

refund any unearned portion of the advance payment.

Item 5 – Advisory Fees and Compensation

Investment advisor representatives are restricted to providing services and charging fees in accordance with the descriptions detailed in this document and the account agreement. However, the exact service and fees charged to a particular client are dependent upon the representative that is working with the client. Advisors are instructed to consider the individual needs of each client when recommending an advisory platform. Investment strategies and recommendations are tailored to the individual needs of each client.

The payment of advisory fees is, as indicated on the Asset Management Agreement, executed by the client. If for example the fee were quarterly, the below billing formula would apply. Fees are billed in advance based on assets under management as of the last business day of the previous quarter. [Quarter End Value x Advisory Fee] / 360 x 90 Days = Advance Billing

The specific manner in which fees are charged is established in a client's written agreement based on the below fee schedule. Planned Financial Services takes into account the aggregation of a Client's total advisory accounts under their management.

| Total Assets Under Management | Advisory Cost Schedule |
|--------------------------------------|-------------------------------|
| Up to \$500,000 | 1.50% |
| \$500,001 - \$1,000,000 | 1.25% |
| \$1,000,001 - \$3,000,000 | 1.10% |
| \$3,000,000 - \$4,000,000 | 1.00% |
| \$4,000,000 - \$6,000,000 | 0.90% |
| \$6,000,000 - \$10,000,000 | 0.80% |
| \$10,000,000 - \$15,000,000 | 0.70% |
| \$15,000,000 - \$20,000,000 | 0.60% |
| \$20,000,000 - \$50,000,000 | 0.50% |
| More than \$50 million | 0.45% |

Clients may also incur certain charges imposed by third-parties in connection with investments made in the account(s), including, but not necessarily limited to, the following types of charges: investment managers, mutual fund management fees and administrative serving fees, mutual fund 12b-1 fees, certain deferred sales charges on previously purchased mutual funds, clearing, custody, postage and handling, other transaction charges and service fees (i.e. account transfer fees, wire transfer fees, termination fees, etc.) interest on debt balances, IRA Qualified Retirement Plan fees, and other costs or charges with securities transactions mandated by law. Further information regarding charges and fees assessed by a mutual fund or other securities sponsors is available in the appropriate prospectus or disclosure statement.

Clients may terminate the agreement without penalty for a full refund of the fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract generally with 30 days' written notice. If the advisory agreement is terminated before the end of the quarterly period, client is entitled to a pro-rated refund of any pre-paid quarterly advisory fee based on the number of days remaining in the quarter after the termination date, which will be processed by the custodian.

Hourly Consulting Fees

The hourly consulting fee will be based on the type of services to be provided, experience and expertise, and the sophistication and bargaining power of the client. The current hourly charge is \$250.00 per hour and is subject to change at any time with notice to the client. Individual complexities will determine the total fee charged based on the number of hours estimated to complete the plan but not billed based on actual hours. A higher or lower fee may apply under extenuating circumstances and requires approval by the Chief Compliance Officer. Clients are not “fit” into a particular service level. Rather, a plan is designed to be specific to each individual client and their unique circumstances.

The following criteria will be considered as appropriate when determining the number of hours expected to create a client specific financial plan.

- Total income
- Net worth
- Marital status
- Tax bracket
- Assets under management
- Children
- Education costs
- Timeframe
- Risk tolerance
- Objectives
- Account types and holdings
- Investment experience
- Budget
- Expected number of client meetings
- Phone conferences
- Amount of material required to review and analyze
- Number of accounts
- Type of holdings
- Complexity of the client’s finances

Payment for services is generally due upon completion of each hourly session. In the event that a client terminates the services, they will be entitled to a refund of any unearned fees by subtracting the earned fees from any amount pre-paid, if applicable.

Retainer Agreement

In some circumstances, a Retainer Agreement is executed in lieu of a fixed fee arrangement when a client’s financial management is more complex, requiring more constant, ongoing advice and service while limiting a client’s total fee. A typical retainer, without consideration of any assets under Planned Financial Services’ management, is generally \$5,000 to \$20,000 annually and billed in advance of each quarter. If a client terminates during the quarter, the fee is prorated by the number of days in that quarter.

Tax Preparation Agreement

Tax preparation work performed separately from an Advisory Service Agreement or a Retainer Agreement is billed a fixed fee or at a rate of \$250.00 per hour which is subject to change at any time with notice to the client. The Minimum fixed fee for tax preparation engagement is \$400.00. Eligible federal and applicable state returns are filed electronically.

Payment for hourly consulting is to Planned Financial Services.

Financial Planning

Financial Planning fees are generally fixed based on an estimated number of hours, but in some cases financial planning may be offered on an actual hourly basis. Financial planning fees and payment schedules are negotiated, but generally we can require 50% up front and the balance after the presentation of our findings and/or upon further completion of any necessary consulting. In the event that a client terminates the services, they will be entitled to a refund of any unearned fees by subtracting the earned fees from the amount paid up front. Planned Financial Services does not require or solicit prepayment of more than \$5,000 in fees per client, six months or more in advance.

Individuals- Fixed fees are based on a project basis with, at our discretion, 50% payable in advance, and the balance payable within 30 days of the initial presentation recommendations. Fixed fees for projects generally range from \$1,500 to \$10,000 but may exceed \$10,000 depending on the complexity of a plan. Retainer engagements typically range from \$5,000 to \$20,000 annually (billed quarterly in advance).

Clients, if deemed to be at risk, going through (and not limited to) bankruptcy or divorce, at our discretion, may be required to fund a retainer. When the retained balance is within 10% of the original retainer amount, the client will be required to deposit funds up to the original retainer amount before any further work is done. Any unused retainer balance, at the completion of our work, will be refunded to the client.

Pension and Profit-Sharing Plans- Fees are based on an hourly rate of \$250.00 per hour, subject to change at any time with notice to the client. At times because of the scope of the project, the applicant will fix the fee based upon projected hours needed to complete the project times the hourly billing rate.

In the event that the client's situation is substantially different than disclosed at the initial meeting, a revised fee will be provided for mutual agreement. The client must approve the change of scope in advance of the additional work being performed when a fee increase is necessary.

Defined Benefit/Defined Contribution Consulting Fees

The Fee for Defined Contribution and Defined Benefit plans is a revenue neutral asset-based fee that is billed quarterly based on the average values of the plan assets.

The advisory fee schedule is based on the plan sponsor utilizing our four (4) core services:

- a) Investment Fiduciary Services and Plan Liaison
- b) Tactically Managed Asset Allocation Portfolios and
- c) Section 3(38) Fiduciary Services
- d) Fiduciary Plan Services and Section 3(21)
- e) Fiduciary Services Fee
- f) Participant Advisory Services Fee

Our annual advisory fee percentage has a sliding scale as the total assets continue to increase. Once a plan reaches these levels, the plan sponsor is contacted to discuss the fee reduction.

Defined Benefit/Defined Contribution Hourly Consulting

Fees are based on an hourly rate of \$250.00 per hour, subject to change at any time with notice to the client. At times, because of the scope of the project, applicant will fix the fee based upon projected hours needed to complete the project times the hourly billing rate.

In the event that the client's situation is substantially different than disclosed at the initial meeting, a revised fee will be provided for mutual agreement. The client must approve the change of scope in advance of the additional work being performed when a fee increase is necessary.

Item 6 – Performance-Based Fees and Side-by-Side Management

None of the advisors at Planned Financial Services accepts performance-based fees – that is, fees based on a share of capital gains or capital appreciation of assets (such as a client that is a hedge fund

or other pooled investment vehicle). We also do not participate in side-by-side management, where an advisor manages accounts that are charged a performance-based fee and accounts that are charged another type of fee, such as an hourly or fixed fee or an asset-based fee.

Item 7 – Types of Clients

Planned Financial Services generally provides investment advice to individuals, pension and profit-sharing plans, trusts, estates, or charitable organizations, corporations, or business entities.

Client relationships vary in scope and length of service.

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

A client's portfolio may include assets of publicly held companies in the United States and foreign markets. This may include both equities and fixed income assets. Other options may include domestic and foreign debt instruments (i.e., government and corporate bonds), real estate investment trusts and mutual funds or private placements that invest in natural resources or managed futures (markets such as, and not limited to, currency, commodity, agriculture, and energy).

Each market may function and change in different ways depending on supply and demand, current events, and investor behaviors. While our goal is to help increase a client's net worth, there is potential for losses in market, principal, and interest values. These changes may also affect a client's tax situation and filings. The most commonly purchased share class of mutual funds are typically held for one year and may be exchanged (no transaction cost to client) during the year to properly align an account with its asset allocation model. Holding recommended mutual funds for less than a year can result in contingent deferred sales charges and short-term gains / losses in non-qualified accounts.

Analysis and strategies are generally based on:

- Publicly available data
- A client's net worth
- Risk tolerance
- Client goals for investment accounts
- Commentary and information obtained from industry analysts

The client's individual investment strategy is tailored to their specific needs and may include some or all the previously mentioned securities. Each portfolio will be initially designed to meet a particular investment goal, which we determine to be suitable to the client's circumstances. Once the appropriate portfolio has been determined, we regularly review the portfolio and if appropriate, rebalance the portfolio based upon the client's individual needs, stated goals and objectives. Each client has the opportunity to place reasonable restrictions on the types of investments to be held in the portfolio.

Planned Financial Services may use one or more of the following methods: fundamental analysis and technical analysis, cyclical analysis, and charting analysis in order to formulate investment advice when managing assets. Depending on the analysis, Planned Financial Services will implement a long or short-term trading strategy based on the particular objectives and risk tolerance of each individual client.

- **Fundamental Analysis** – involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages. Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

- **Technical Analysis** – involves the analysis of past market data, primarily price and volume. Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not consider new patterns that emerge over time.
- **Cyclical Analysis** – involves the analysis of business cycles to find favorable conditions for buying and/or selling a security. Cyclical analysis assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are two-fold: 1) the markets do not always repeat cyclical patterns; and 2) if too many investors begin to implement this strategy, then it changes the very cycles these investors are trying to exploit.
- **Charting Analysis** - involves the gathering and processing of price and volume information for a particular security. This price and volume information is analyzed using mathematical equations. The resulting data is then applied to graphing charts, which is used to predict future price movements based on price patterns and trends.

Investing in securities involves risk of loss, a risk that clients should be prepared to bear. There are different types of investments that involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy will be profitable or equal any specific performance level(s). Past performance is not indicative of future results.

Planned Financial Services' methods of analysis and investment strategies do not represent any significant or unusual risks however all strategies have inherent risks and performance limitations.

Risk of Loss

- **Market Risk** – the risk that the value of securities may go up or down, sometimes rapidly or unpredictably, due to factors affecting securities markets generally or particular industries.
- **Interest Rate Risk** – the risk that fixed income securities will decline in value because of an increase in interest rates; a bond or a fixed income fund with a longer duration will be more sensitive to changes in interest rates than a bond or bond fund with a shorter duration.
- **Credit Risk** – the risk that an investor could lose money if the issuer or guarantor of a fixed income security is unable or unwilling to meet its financial obligations.
- **Business Risk** – the measure of risk associated with a particular security. It is also known as unsystematic risk and refers to the risk associated with a specific issuer of a security. Generally speaking, all businesses in the same industry have similar types of business risk. More specifically, business risk refers to the possibility that the issuer of a particular company stock or a bond may go bankrupt or be unable to pay the interest or principal in the case of bonds.
- **Taxability Risk** – the risk that a security that was issued with tax-exempt status could potentially lose that status prior to maturity. Since municipal bonds carry a lower interest rate than fully taxable bonds, the bond holders would end up with a lower after-tax yield than originally planned.
- **Call Risk** – the risk specific to bond issues and refers to the possibility that a debt security will be called prior to maturity. Call risk usually goes hand in hand with reinvestment risk because the bondholder must find an investment that provides the same level of income for equal risk. Call risk is most prevalent when interest rates are falling, as companies trying to save money will usually redeem bond issues with higher coupons and replace them on the bond market with issues with lower interest rates.

- **Inflationary Risk** – the risk that future inflation will cause the purchasing power of cash flow from an investment to decline.
- **Liquidity Risk** – the possibility that an investor may not be able to buy or sell an investment as and when desired or in sufficient quantities because opportunities are limited.
- **Market Risk** – the risk that will affect all securities in the same manner caused by some factor that cannot be controlled by diversification.
- **Reinvestment Risk** – the risk that falling interest rates will lead to a decline in cash flow from an investment when its principal and interest payments are reinvested at lower rates.
- **Social/Political** – the possibility of nationalization, unfavorable government action or social changes resulting in a loss of value.
- **Legislative Risk** – the risk of a legislative ruling resulting in adverse consequences.
- **Currency/Exchange Rate Risk** – the risk of a change in the price of one currency against another.
- **Financial Risk** – Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Types of Investments (Examples, not limitations)

- **Mutual Funds** – a pool of funds collected from many investors for the purpose of investing in securities such as stocks, bonds, money market instruments and similar assets.
 - **Open-End Mutual Funds** – a type of mutual fund that does not have restrictions on the amount of shares the fund will issue and will buy back shares when investors wish to sell. Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond “fixed income” nature (lower risk) or stock “equity” nature.
 - **Closed-End Mutual Funds** – a type of mutual fund that raises a fixed amount of capital through an initial public offering (IPO). The fund is then structured, listed and traded like a stock on a stock exchange. Clients should be aware that closed-end funds available within the program are not readily marketable. In an effort to provide investor liquidity, the funds may offer to repurchase a certain percentage of shares at net asset value on a periodic basis. Thus, clients may be unable to liquidate all or a portion of their shares in these types of funds.
- **Alternative Strategy Mutual Funds** – Certain mutual funds available in the program invest primarily in alternative investments and/or strategies. Investing in alternative investments and/or strategies may not be suitable for all investors and involves special risks, such as risks associated with commodities, real estate, and leverage, selling securities short, the use of derivatives, potential adverse market forces, regulatory changes, and potential illiquidity. There are special risks associated with mutual funds that invest principally in real estate securities, such as sensitivity to changes in real estate values and interest rates and price volatility because of the fund's concentration in the real estate industry.
- **Unit Investment Trust (UIT)** – An investment company that offers a fixed, unmanaged portfolio, generally of stocks and bonds, as redeemable "units" to investors for a specific period of time. It is

designed to provide capital appreciation and/or dividend income. UITs can be resold in the secondary market. A UIT may be either a regulated investment corporation (RIC) or a grantor trust. The former is a corporation in which the investors are joint owners; the latter grants investors proportional ownership in the UIT's underlying securities.

- **Equity** – investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environment.
- **Exchange Traded Funds (ETFs)** – An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed “electronic shares” not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors.
- **Exchange-Traded Notes (ETNs)** – An ETN is a senior unsecured debt obligation designed to track the total return of an underlying market index or other benchmark. ETNs may be linked to a variety of assets, for example, commodity futures, foreign currency, and equities. ETNs are similar to ETFs in that they are listed on an exchange and can typically be bought or sold throughout the trading day. However, an ETN is not a mutual fund and does not have a net asset value; the ETN trades at the prevailing market price. Some of the more common risks of an ETN are as follows. The repayment of the principal, interest (if any), and the payment of any returns at maturity or upon redemption are dependent upon the ETN issuer’s ability to pay. In addition, the trading price of the ETN in the secondary market may be adversely impacted if the issuer’s credit rating is downgraded. The index or asset class for performance replication in an ETN may or may not be concentrated in a specific sector, asset class or country and may therefore carry specific risks.
- **Fixed Income** – investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best-known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk (as interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities). Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.
- **Structured Products** – Structured products are securities derived from another asset, such as a security or a basket of securities, an index, a commodity, a debt issuance, or a foreign currency. Structured products frequently limit the upside participation in the reference asset. Structured products are senior unsecured debt of the issuing bank and subject to the credit risk associated with that issuer. This credit risk exists whether or not the investment held in the account offers principal protection. The creditworthiness of the issuer does not affect or enhance the likely performance of the investment other than the ability of the issuer to meet its obligations. Any payments due at maturity are dependent on the issuer’s ability to pay. In addition, the trading price of the security in the secondary market, if there is one, may be adversely impacted if the

issuer's credit rating is downgraded. Some structured products offer full protection of the principal invested, others offer only partial or no protection. Investors may be sacrificing a higher yield to obtain the principal guarantee. In addition, the principal guarantee relates to nominal principal and does not offer inflation protection. An investor in a structured product never has a claim on the underlying investment, whether a security, zero coupon bond, or option. There may be little or no secondary market for the securities and information regarding independent market pricing for the securities may be limited. This is true even if the product has a ticker symbol or has been approved for listing on an exchange. Tax treatment of structured products may be different from other investments held in the account (e.g., income may be taxed as ordinary income even though payment is not received until maturity). Structured CDs that are insured by the FDIC are subject to applicable FDIC limits.

- **Hedge Funds and Managed Futures** – Hedge and managed futures funds are available for purchase in the program by clients meeting certain qualification standards. Investing in these funds involves additional risks including, but not limited to, the risk of investment loss due to the use of leveraging and other speculative investment practices and the lack of liquidity and performance volatility. In addition, these funds are not required to provide periodic pricing or valuation information to investors and may involve complex tax structures and delays in distributing important tax information. Client should be aware that these funds are not liquid as there is no secondary trading market available. At the absolute discretion of the issuer of the fund, there may be certain repurchase offers made from time to time. However, there is no guarantee that client will be able to redeem the fund during the repurchase offer.
- **Annuities** – are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet pre-determined requirements or other long-term goals. An annuity is not a life insurance policy. Variable annuities are designed to be long-term investments, to meet retirement and other long-range goals. Variable annuities are not suitable for meeting short-term goals because substantial taxes and insurance company charges may apply if you withdraw your money early. Variable annuities also involve investment risks, just as mutual funds do.
- **Variable Annuities** – If client purchases a variable annuity that is part of the program, client will receive a prospectus and should rely solely on the disclosure contained in the prospectus with respect to the terms and conditions of the variable annuity. Client should also be aware that certain riders purchased with a variable annuity may limit the investment options and the ability to manage the subaccounts.
- **Non-U.S. Securities** – present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.
- **Margin Accounts** – Client should be aware that margin borrowing involves additional risks. Margin borrowing will result in increased gain if the value of the securities in the account go up but will result in increased losses if the value of the securities in the account goes down. The custodian, acting as the client's creditor, will have the authority to liquidate all or part of the account to repay any portion of the margin loan, even if the timing would be disadvantageous to the client. For performance illustration purposes, the margin interest charge will be treated as a withdrawal and will, therefore, not negatively impact the performance figures reflected on the quarterly advisory reports.
- **Long-Term Purchases** – are securities purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year.

- **Short-Term Purchases** – are securities purchased with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the securities' short-term price fluctuations.

Other investment types may be included as appropriate for a particular client and their respective trading objectives.

Item 9 – Disciplinary Information

Registered investment advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of an advisory firm or the integrity of a firm's management.

Any such disciplinary information for the company and the company's investment advisor representatives would be provided herein and publicly accessible by selecting the Investment Advisor Search option at <http://www.adviserinfo.sec.gov>. There are no legal or material disciplinary events to disclose.

Item 10 – Other Financial Industry Activities and Affiliations

In their capacity as Registered Representatives of LPL Financial, investment advisor representatives of Planned Financial Services sell securities and receive normal and customary commissions as a result of such purchases and sales. Certain investment advisor representatives of Planned Financial Services are Certified Public Accountants (CPAs). In such capacity, they provide tax consulting to individuals and businesses. Certain investment advisor representatives of Planned Financial are licensed insurance agents for several insurance companies. In such capacity, they may offer insurance products and receive normal and customary commissions as a result of such purchases. Planned Financial Services assists business clients with designing retirement and pension plans. Applicant describes and markets this service as "401(K) Prosperity", which is a tradename registered by Applicant in Ohio.

Neither Planned Financial Services nor any of the management persons are registered or has a registration pending to register as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

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

Planned Financial Services maintains a Code of Ethics, which serves to establish a standard of business conduct for all employees that are based upon fundamental principles of openness, integrity, honesty, and trust. The code of ethics includes guidelines regarding personal securities transactions of its employees and investment advisor representatives.

The code of ethics permits employees and investment advisor representatives or related persons to invest for their own personal accounts in the same or different securities that an investment advisor representative may purchase for clients in program accounts. This presents a potential conflict of interest because trading by an employee or investment advisor representatives in a personal securities account in the same or different security on or about the same time as trading by a client could potentially disadvantage the client.

Planned Financial Services addresses this conflict of interest by requiring in its code of ethics that employees and investment advisor representatives report certain personal securities transactions and holdings to the Chief Compliance Officer for review.

Neither Planned Financial Services nor a related person recommends to clients, or buys or sells for client accounts, securities in which they or a related person has a material financial interest.

An investment advisor is considered a fiduciary. As a fiduciary, it is an investment advisor's responsibility to provide fair and full disclosure of all material facts and to act solely in the best interest of each of our clients at all times. Planned Financial Services has a fiduciary duty to all clients. Our fiduciary duty is considered the core underlying principle for our Code of Ethics which also includes insider trading and personal securities transactions policies and procedures.

We require all of our supervised persons to conduct business with the highest level of ethical standards and to comply with all federal and state securities laws at all times. Upon employment or affiliation and at least annually thereafter, all supervised persons will sign an acknowledgement that they have read, understand, and agree to comply with our Code of Ethics.

Our firm and supervised persons must conduct business in an honest, ethical, and fair manner and avoid all circumstances that might negatively affect or appear to affect our duty of complete loyalty to all clients. This disclosure is provided to give all clients a summary of our Code of Ethics. However, if a client or a potential client wishes to review our Code of Ethics in its entirety, a copy will be provided promptly upon request.

Item 12 – Brokerage Practices

Broker/Dealer

Planned Financial Services will recommend the use of LPL Financial for securities transactions. Investment advisor representatives do not maintain discretionary authority in determining the broker/dealer with whom orders for the purchase and sale of securities are placed for execution or the commission rates at which such transactions are affected. Each client of Planned Financial Services will be required to establish an account if not already done. Please note that not all advisors have this requirement.

Non- Soft Dollars

Planned Financial Services receives non-soft dollar support services and/or products from LPL Financial which assist Planned Financial Services to better monitor and service client accounts. These support services and/or products may be received without cost, at a discount, and/or at a negotiated rate, and may include the following:

- Investment-related research
- Pricing information and market data
- Software and other technology that provide access to client account data
- Compliance and/or practice management-related publications
- Consulting services
- Attendance at conferences, meetings, and other educational and/or social events
- Marketing support
- Computer hardware and/or software
- Other products and services used in furtherance of investment advisory business operations

These support services are provided to Planned Financial Services based on the overall relationship between Planned Financial Services and LPL. They are not the result of soft dollar arrangements or any other express arrangement that involves the execution volume of client transactions. Clients do not pay more for services as a result of this arrangement.

There is no corresponding commitment made by the Planned Financial Services to LPL or any other custodian to invest any specific amount or percentage of client assets in any specific securities as a

result of the arrangement. These non-soft dollars are a benefit to Planned Financial Services because Planned Financial Services does not have to produce or pay for the research, products, or services. Consequently, Planned Financial Services may have an incentive to select, recommend or expand the custodian's services as a result of receiving the research or other products or services, rather than on our clients' interest in receiving the most favorable execution.

Planned Financial Services examined this potential conflict of interest when we chose to enter into the relationship with our custodians and we have determined that the relationship is in the best interest of our firm's clients and satisfies our fiduciary obligations, including our duty to seek best execution.

Best Execution

Clients may pay a commission that is higher than another qualified broker-dealer might charge to effect the same transaction. We determine in good faith that the commission is reasonable in relation to the value of the brokerage and research services received.

In seeking best execution, the determining factor is not the lowest possible cost, but rather whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although we will seek competitive rates to the benefit of all clients, we may not necessarily obtain the lowest possible commission rates for specific client account transactions.

Our recommendations to our clients are based on our clients' interests in receiving best execution and the level of competitive, professional services. Our firm does not receive client brokerage commissions (or markups or markdowns) to obtain research or other products or services. Neither does our firm receive brokerage commissions for client referrals.

Trade Aggregation

For advisory services, Planned Financial Services and its related persons may aggregate transactions in equity and fixed income securities for a client with other clients to improve the quality of execution. When transactions are so aggregated, the actual prices applicable to the aggregated transactions will be averaged, and the client account will be deemed to have purchased or sold its proportionate share of the securities involved at the average price obtained. Planned Financial Services and its related persons may determine not to aggregate transactions, for example, based on the size of the trades, number of client accounts, the timing of trades, and the liquidity of the securities and the discretionary or non-discretionary nature of the trades. If Planned Financial Services or its related persons do not aggregate orders, some clients purchasing securities around the same time may receive a less favorable price than other clients. This means that this practice of not aggregating may cost clients more money.

Item 13 – Review of Accounts

Account surveillance is conducted on an ongoing basis by Cynthia Yang—Wealth Advisor, Ashley Benton-Cooper—Compliance Specialist and Joan Borecky—Client Liaison. All investment supervisory clients are advised that it remains their responsibility to advise Planned Financial Services of any changes in their investment objectives and/or financial situation. All clients (in person or via telephone) are encouraged to review financial planning issues (to the extent applicable), investment objectives and account performance with their investment advisor representative on an annual basis.

Client review periods are generally annual depending on market conditions, the client's funding needs and changes in investment objectives. Occasionally a review may result in a "no change" recommendation. If a client has a change in their financial situation, Planned Financial Services will perform a review to make sure that the portfolio is appropriate for the client and meets their cash needs.

Clients are provided, at least quarterly, with written transaction confirmation notices and regular written summary account statements directly from the broker-dealer/custodian and/or program sponsor for accounts.

Item 14 – Client Referrals and Other Compensation

Planned Financial Services may receive an economic benefit from LPL Financial or other custodians such as, financial assistance or the sponsorship of conferences and educational sessions, marketing support, incentive awards, payment of travel expenses, and tools to assist investment advisor representative in providing various services to clients.

Planned Financial Services and employees may receive additional compensation from product sponsors. However, such compensation is not tied to the sales of any products. Compensation may include such items as gifts valued at less than \$100 annually, an occasional dinner or ticket to a sporting event, or reimbursement in connection with educational meetings with investment advisor representative, client workshops or events, marketing events or advertising initiatives, including services for identifying prospective clients.

Product sponsors may also pay for, or reimburse Planned Financial Services for, the costs associated with, education, due diligence or training events that may be attended by Planned Financial Services employees including investment advisor representatives and for Planned Financial Services sponsored conferences and events. Such additional compensation represents a conflict of interest because investment advisor representatives of Planned Financial Services have a fiduciary duty to act in the client's best interest.

Please see Item 5, Fees and Compensation, Item 10, Other Financial Industry Activities and Affiliations and Item 12, Brokerage Practices, for additional discussion concerning other compensation.

Item 15 – Custody

Planned Financial Services does not have custody of client funds. Clients of Planned Financial Services authorize LPL Financial and other qualified custodians to deduct Planned Financial Service's investment management advisory fees from their account.

Note: Aggregate client asset minimums may apply in order to utilize another custodian.

- LPL Financial LLC as the custodian sends statements at least quarterly to clients showing all disbursements in account including the amount of the advisory fees paid to advisor, the value of client assets upon which advisor's fee was based, and the specific manner in which advisor's fee was calculated.
- Clients provide authorization to LPL Financial LLC permitting advisory fees to be deducted from client advisory account.
- LPL Financial LLC calculates the advisory fees and deducts them from client's account every quarter.

LPL Financial sends statements and performance reports at least quarterly to clients showing all disbursements in the account including the amount of the advisory fees paid to advisor, the value of client assets upon which advisor's fee was based, and the specific manner in which advisor's fee was

calculated. Clients should review the fee calculated and deducted by LPL Financial to ensure that the fees were calculated correctly.

- Payment of fees may result in the liquidation of a client's positions if there are insufficient funds in the account.
- Fees are assessed on all assets in the account(s), including securities, cash, or money market balances.
- Margin debits do not reduce the value of the assets in the account for billing purposes.

Item 16 - Investment Discretion

The client can engage Planned Financial Services to provide investment advisory services on a discretionary basis. Prior to Planned Financial Services assuming discretionary authority over a client's account, the client shall be required to grant permission by executing an advisory agreement, naming Planned Financial Services as the client's attorney and agent-in-fact. Such an agreement, grants Planned Financial Services full authority to buy and/or sell the type and amount of securities on behalf of a client, or otherwise effect investment transactions involving the assets in the client's name found in the discretionary account.

Clients who engage Planned Financial Services on a discretionary basis may, at any time, impose restrictions, in writing, on the discretionary authority (i.e., limit the types/amounts of particular securities purchased for their account, exclude the ability to purchase securities with an inverse relationship to the market, limit or proscribe the use of margin, etc.).

Item 17 – Voting Client Securities

Planned Financial Services does not vote client proxies. Clients will otherwise receive their proxies or other solicitations directly from their custodian. Clients may contact Planned Financial Services at (440) 740-0130 to discuss any questions they may have with a particular solicitation. To request assistance on a proxy voting issue please contact the offering company.

Item 18 – Financial Information

Planned Financial Services does not require or solicit prepayment of more than \$5,000 in fees per client, six months or more in advance or otherwise have actual or constructive custody of client funds. There are no financial conditions that are reasonably likely to impair Planned Financial Services' ability to meet contractual commitments to clients. At no time has Planned Financial Services been the subject of a bankruptcy petition.

End of ADV 2A