

Firm Brochure

(Part 2A of Form ADV)

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This brochure provides information about the qualifications and business practices of White & Company Financial Planning, Inc. If you have any questions about the contents of this brochure, please contact us at: (509)837-6700, or by email at: advisers@whitecocpa.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 White & Company Financial Planning, Inc. is available on the SEC's website at www.adviserinfo.sec.gov

November 2011

Material Changes

Annual Update

The Material Changes section of this brochure will be updated annually when material changes occur since the previous release of the Firm Brochure.

Material Changes since the Last Update

The Dodd-Frank Wall Street Reform and Consumer Protection Act (“Dodd-Frank Act”) has made significant changes to the regulation of investment advisers and now requires those advisers with assets under management of less than \$100 million to register with the appropriate state securities authorities. The final rule was implemented on June 22, 2011.

White & Company Financial Planning, Inc. is now registered with the Washington State Securities Division as a result of this new legislation.

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Advisory Business

Firm Description

White & Company Financial Planning, Inc., (“WCFP”) was founded in 2005.

WCFP provides personalized confidential financial planning and investment management to individuals, pension and profit sharing plans, trusts, estates, charitable organizations and small businesses. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, and estate planning.

WCFP is strictly a fee-only financial planning and investment management firm. The firm does not sell annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products. The firm is not affiliated with entities that sell financial products or securities. No commissions in any form are accepted. No finder’s fees are accepted.

WCFP may also serve as trustee for a trust or serve as personal representative of an estate for a client. This gives WCFP greater powers over accounts that are set up for the trust or estate.

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly by the client on an as-needed basis. Conflicts of interest will be disclosed to the client in the unlikely event they should occur.

The initial meeting, which may be by telephone, is free of charge and is considered an exploratory interview to determine the extent to which financial planning and investment management may be beneficial to the client.

Principal Owners

James Eric Parker is a 50% stockholder. Thomas White is a 50% stockholder.

Types of Advisory Services

Financial Planning

WCFP provides financial planning to its clients. Clients utilizing this service will receive a written financial plan providing the client with a detailed financial plan designed to achieve their stated financial goals and objectives. The financial plan may include any or all of the following areas of concern: Personal budgeting, liability, estate planning and goal setting. Income tax planning, death and disability planning, life insurance consultations and retirement planning. WCFP spends approx 5% of its time on Financial Planning services.

The financial planning process generally includes gathering information through in depth personal interviews. Information gathered includes a client's current financial

status, future goals and attitudes toward risk. Related documents supplied by the client are carefully reviewed, including a questionnaire completed by the client, and a written report is prepared. Should a client choose to implement the recommendations contained in the plan, WCFP suggests the client work closely with his/her attorney, accountant, insurance agent, and/or stockbroker. Implementation of financial plan recommendations is entirely at the client's discretion and the use of WCFP or any affiliated person or entity is not required.

Some clients are provided a written plan that may include a personal balance sheet and certain projections. All reports, financial statement projections and analyses are intended exclusively for the clients use in developing and implementing their financial plan. In view of this limited purpose, the statements should not be considered complete financial statements. We will not audit (examine), review or compile such statements and, accordingly we will not express an opinion or other form of assurance on them, including the reasonableness of assumptions and other data on which any prospective financial statements are based.

It is likely that there will be differences between projected and actual results because events vary and circumstances frequently do not occur as expected and such differences may be material.

Our analyses will be highly dependent on certain economic assumptions about the future. Therefore, the client should establish familiarity with historical data regarding key assumptions such as inflation and investment rates of return, as well as an understanding of how significantly these assumptions affect the results of our analyses. We may counsel the client as to the consistency of the assumptions with relevant historical data, but we will not express any assurance as to the accuracy or reasonableness of your specific data and assumptions. The client is ultimately responsible for the assumptions and personal data upon which our procedures and projections are based. The financial plan assumptions and reports are primarily a tool to alert clients to certain possibilities. The reports are not intended to nor do they provide any guaranty about future events including an individual's investment returns. The implementation of the plan is solely the client's responsibility.

Investment Management

WCFP also provides investment management services. WCFP provides this service to individuals, pension and profit sharing plans, trusts, estates, and corporations. WCFP manages client accounts on a discretionary basis. The asset allocation for a client's investments is guided by the stated objectives and needs of the client (i.e., maximum capital appreciation, growth, income, or growth and income). Once the appropriate asset allocation has been determined, WCFP will review the portfolio and its underlying assets quarterly or annually, and if necessary, reallocate or rebalance the portfolio, based on each client's individual needs.

As of December 31, 2010, WCFP manages approximately \$39,718,000 in assets for approximately 173 clients. All of the assets are managed on a discretionary basis. WCFP spends approx 90% of its time on Investment Management services.

Other Services

On more than an occasional basis, WCFP furnishes advice to clients on financial matters, taxation, trust services and estate planning on an hourly basis. WCFP spends approx 5% of its time on these services.

Tailored Relationships

The goals and objectives for each client is documented in our client files. For financial planning clients, these goals and objectives are the basis for the recommendations that are made. For investment management clients, investment policy statements are created that reflect the stated goals and objective. Clients may impose restrictions on investing in certain securities or types of securities.

Types of Agreements

The following agreements define the typical client relationships.

Financial Planning Agreement

A financial plan is designed to help the client with all aspects of financial planning without ongoing investment management after the financial plan is completed.

The financial plan may include, but is not limited to: a net worth statement; a cash flow statement; 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; a review of insurance policies and recommendations for changes, if necessary; one or more retirement scenarios; estate planning review and recommendations; and education planning with funding recommendations.

Detailed investment advice and specific recommendations are provided as part of a financial plan. Implementation of the recommendations is at the discretion of the client.

Financial planning engagements terminate upon delivery of the financial plan to the client. A financial planning engagement is not an ongoing one. WCFP does not monitor assets, recommendations or the implementation of a financial plan. Ongoing investment advisory services are discussed immediately below as asset allocation services.

If a financial planning engagement is terminated before the presentation of the plan, WCFP does not bill the client for the preparation of the plan.

Investment Management Agreement

An Investment Management Agreement is executed related to asset allocation services when financial planning is not provided as part of the relationship. The asset allocation is guided by the client's goals and objectives. The fee for providing the asset allocation services covered by the Investment Management Agreement is based on a percentage of assets under management. In some cases fees may be negotiable.

Fees for certain immediate family members, employees and employee's immediate family members are waived.

Hourly Planning Engagements

WCFP provides hourly planning services for clients who need advice on a limited scope of work. The hourly rate ranges from \$130 - \$245 per hour, depending on the nature and complexity of each client's circumstances. The fee (based on actual hours) is due upon presentation of the plan to the client.

Types of Investments

Assets are invested primarily in no-load or low-load mutual funds and exchange-traded funds or notes, usually through discount brokers or fund companies. Fund companies charge each fund shareholder an investment management fee that is disclosed in the fund prospectus. Discount brokerages may charge a transaction fee for the purchase of some funds.

Stocks and bonds may be purchased or sold through a brokerage account when appropriate. The brokerage firm charges a fee for stock and bond trades. WCFP does not receive any compensation, in any form, from fund companies.

Investments may also include: equities (stocks), corporate debt securities, commercial paper, certificates of deposit, municipal securities, investment company securities (variable life insurance, variable annuities, and mutual funds shares), U. S. government securities, options contracts and futures contracts.

Investment advice may be offered on any investments held by a client at the start of the advisory relationship. Recommendations for new investments will typically be limited to those listed above.

Initial public offerings (IPOs) are not available through WCFP.

Termination of Agreement

A client agreement may be canceled at any time, by either party, for any reason upon receipt of 30 days written notice. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable. The client has the right to terminate any agreement without penalty within five business days after entering into the agreement.

Fees and Compensation

Description

WCFP bases its fees on a percentage of assets under management or on an hourly basis.

The fee for a financial plan depends upon the facts known at the start of the engagement. The fee typically ranges from \$500 to \$7,500, depending on the nature complexity of each client's circumstances and the net worth of the client. The low

end of the range normally is a plan that is restricted to a single component of a client's financial situation. For example, reviewing the client's life insurance plan. The high end of the range would include all components of the client's financial situation and be summarized in a written plan. The fee is normally due upon presentation of the plan.

The fee for asset allocation services will be charged as a percentage of assets under management, according to the schedule below.

<u>Assets Under Management</u>	<u>Annual Fee %</u>
\$0 - \$1,000,000	1.00%
\$1,000,001 - \$5,000,000	0.85%
over \$5,000,000	0.75%

For account values in excess of \$100,000, clients will be invoiced in arrears (at the end of each quarter) based upon the value (market value or fair market value in absence of market value, plus any credit balance or minus any debit balance), of the client's account at the end of the previous quarter. For account values less than \$100,000, clients will be invoiced in arrears, annually.

The fee charged is calculated as described above and is not charged on the basis of a share of capital gains upon or capital appreciation of the funds or any portion of the funds of an advisory client (SEC Rule 205(a)(1)).

In certain circumstances, fees may be negotiable. WCFP waives investment advisory fees for certain immediate family members, employees, and employees' immediate family members.

Fee Billing

Investment management fees are billed quarterly or on an annual basis, in arrears, meaning that we invoice you after the three-month or twelve-month billing period has ended. Fees can either be deducted from a designated client account or billed directly to clients. The client must consent in advance to direct debiting of their investment account. Payment in full is expected upon invoice presentation.

Fees for financial plans are billed and due upon delivery of the financial plan.

Other Fees

Custodians may charge transaction fees on purchases or sales of certain mutual funds and exchange-traded funds. These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security. See the section on Brokerage Practices on page 10 for more information.

Expense Ratios and Other Mutual Fund Fees

Mutual funds and exchange traded funds generally charge a management fee for their services as investment managers. The management fee is called an expense ratio.

For example, an expense ratio of 0.50 means that the mutual fund company charges 0.5% for their services. These fees are in addition to the fees paid by you to WCFP. In addition, mutual funds and exchange traded funds also bear their own internal transaction and execution costs. Some mutual funds pay 12b-1 fees, distribution fees or shareholder service fees to broker dealers that offer such mutual funds to their clients. Performance figures quoted by mutual fund companies in various publications are after their fees have been deducted.

Some mutual funds companies also impose redemption fees. A redemption fee is another type of fee that some funds charge shareholders when shares are sold within a short period of time from the purchase of the mutual fund shares. Although the redemption fee is deducted from the sale proceeds just like a deferred sales load, it is not considered to be a sales load. It is not the general practice of WCFP to sell client's securities in a period that would generate a redemption fee, it should be anticipated that WCFP might do so if in its opinion the sale is in the client's best interest, is requested by the client or the shares must be redeemed to pay fees from the account.

A complete explanation of these expenses and charges is contained in the prospectus and "statement of additional information" for each mutual fund.

Past Due Accounts and Termination of Agreement

WCFP reserves the right to stop work on any account that is more than 30 days overdue. In addition, WCFP reserves the right to terminate any financial planning engagement where a client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate, in WCFP's judgment, to providing proper financial advice. Any unused portion of fees collected in advance will be refunded within 30 days.

A client agreement may be terminated at any time, by either party, for any reason upon receipt of 30 days written notice. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable. The client has the right to terminate any agreement without penalty within five business days after entering into the agreement.

Performance-Based Fees

Sharing of Capital Gains

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

WCFP does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

Types of Clients

Description

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

Client relationships vary in scope and length of service.

Account Minimums

WCFP does not impose an account minimum size. However, it is recommended that the clients have at least \$40,000 in order to implement the recommended asset allocation.

Accounts of less than \$40,000 may be set up when the client and the advisor anticipate the client will add additional funds on a consistent basis. Other exceptions will apply to employees of WCFP and their relatives, or relatives of existing clients.

Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

WCFP uses fundamental analysis to analyze securities. Fundamental analysis attempts to measure the value of a security by studying items that are directly related to the security. The main sources of information include financial newspapers and magazines, inspections of corporate activities, research materials prepared by others, corporate rating services, timing services, annual reports, prospectuses, filings with the Securities and Exchange Commission, and company press releases.

Other sources of information that WCFP may use include Morningstar Principia mutual fund information, Morningstar Principia stock information, Charles Schwab & Company's advising and research services, Advisor Intelligence, and the World Wide Web.

Investment Strategies

The primary investment strategy used on client accounts is an asset allocation based on the risk analysis done at the beginning of the client relationship. The risk analysis takes into account the clients financial situation, goals and objectives as well as their historical investment experience. WCFP utilizes passively-managed index and exchange-traded funds within certain asset classes and actively-managed funds where there are greater opportunities to make a difference. Portfolios are globally diversified to control the risk associated with traditional markets.

Each client is provided an Investment Policy Statement that documents their objectives and their desired investment strategy. The client's risk tolerance, goals and objectives may change over time. WCFP will modify the asset allocation as necessary to match the clients goals and objectives.

Other strategies utilized may include long-term purchases (holding securities at least one year), short-term purchases (holding securities less than one year) and selling securities to trigger tax losses.

Risk of Loss

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **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.

WCFP does not guarantee the future performance of the Account or any specific level of performance, the success of any investment decision or strategy that WCFP may

use, or the success of WCFP's overall management of the Account. Client understands that investment decisions made are subject to various market, currency, economic, political and business risks, and that those investment decisions will not always be profitable. WCFP will provide advice only with respect to the securities, cash and other investments held in Client's Account and, in making recommendations with respect to the Account, WCFP will not consider any other securities, cash or other investments owned by Client. Except as may otherwise be provided by law, WCFP will not be liable to Client for (a) any loss that Client may suffer by reason of any investment decision made or other action taken or omitted in good faith by WCFP with that degree of care, skill, prudence, and diligence under the circumstances that a prudent person acting in a fiduciary capacity would use; (b) any loss arising from WCFP's adherence to Client's written or oral instructions; or (c) any act or failure to act by the Custodian, any broker or dealer, or by any other third party. The federal and state securities laws impose liabilities under certain circumstances on persons who act in good faith, and therefore nothing in this Agreement will waive or limit any rights that Client may have under those laws.

Disciplinary Information

Legal and Disciplinary

The firm and its employees have not been involved in legal or disciplinary events related to past or present investment clients.

Other Financial Industry Activities and Affiliations

Financial Industry Activities

WCFP is a Registered Investment Advisor with the Washington State Securities Division.

Affiliations

James Eric Parker and Thomas White, Shareholders of WCFP, each own 50% of White & Company, PC (W&C), an accounting firm. James Eric Parker, Gregory Vander Top, Ivan White, Thomas White and Misti Wiederspohn are investment adviser representatives of WCFP that also work for W&C. These individuals may each spend as much as 25% of their time with WCFP and the remainder of their time with W&C.

W&C may recommend WCFP to their respective clients in need of advisory services. WCFP may recommend W&C to advisory clients in need of accounting services. Account services provided by W&C are separate and distinct from the advisory services of WCFP. Any fees charged by W&C are separate and in addition to any fees charged by WCFP. There are no referral fee arrangements between WCFP and W&C for these recommendations. No WCFP client is obligated to use W&C for any accounting services or vice versa. In some situations W&C or WCFP employees will

serve as a trustee of a trust or personal representative for an estate or trust for a WCFP advisory client. In these situations, W&C or WCFP may have the authority to sign checks or disburse funds from a WCFP advisory client.

WCFP share office space, support staff and office supplies with W&C.

Because of the affiliation through common ownership and common employees, both W&C and WCFP have a financial incentive to make successful referrals between themselves. The financial incentive creates a potential conflict of interest between the client, W&C and WCFP.

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

Code of Ethics

The employees of WCFP have committed to a Code of Ethics that is available for review by clients and prospective clients upon request. The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

Participation or Interest in Client Transactions

WCFP and its employees may buy or sell securities that are also held by or recommended to clients. Employees may not trade their own securities ahead of client trades. Employees comply with the provisions of the *WCFP Compliance Manual*.

Personal Trading

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

Brokerage Practices

Selecting Brokerage Firms

WCFP does not maintain custody of your assets that we manage. Your assets must be maintained in an account at a “qualified custodian,” generally a broker-dealer or bank. We recommend that our clients use Charles Schwab & Co., Inc. (Schwab), a registered broker-dealer, member SIPC, as the qualified custodian. We are independently owned and operated and are not affiliated with Schwab. Schwab will hold your assets in a brokerage account and buy and sell securities when we instruct them to. While we recommend that you use Schwab as custodian/broker, you will decide whether to do so and will open your account with Schwab by entering into an account agreement directly with them. We do not open the account for you, although

we may assist you in doing so. Even though your account is maintained at Schwab, we can still use other brokers to execute trades for your account as described below.

We seek to recommend a custodian/broker who will hold your assets and execute transactions on terms that are, overall, most advantageous when compared to other available providers and their services. We consider a wide range of factors, including, among others:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody)
- Capability to execute, clear, and settle trades (buy and sell securities for your account)
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- Availability of investment products (stocks, bonds, mutual funds, exchange-traded funds [ETFs], etc.)
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services
- Reputation, financial strength, and stability
- Prior service to us and our other clients
- Availability of other products and services that benefit us, as discussed below (see “Soft Dollars”)

Instead of using Schwab as the broker or dealer for the Account, Client may direct Adviser in writing to use a particular broker or dealer to execute some or all transactions for Client’s Account. In that case, Client will negotiate terms and arrangements for the Account with that broker or dealer.

Best Execution

For our clients’ accounts that Schwab maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. Schwab’s commission rates applicable to our client accounts are based on the amount of assets the client has at Schwab. This arrangement benefits you because the overall commission rates you pay are lower than they would be otherwise. In addition to commissions, Schwab charges you a flat dollar amount as a “primebroker” or “trade away” fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your Schwab account. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we have Schwab execute most trades for your account. We have determined that having Schwab execute most trades is consistent with our

duty to seek “best execution” of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above

Soft Dollars

Schwab Advisor Services™ (formerly called Schwab Institutional®) is Schwab’s business serving independent investment advisory firms like us. They provide us and our clients with access to its institutional brokerage—trading, custody, reporting, and related services—many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our clients’ accounts, while others help us manage and grow our business. Schwab’s support services generally are available on an unsolicited basis (we don’t have to request them) and at no charge to us as long as our clients collectively maintain a total of at least \$10 million of their assets in accounts at Schwab. If our clients collectively have less than \$10 million in assets at Schwab, Schwab may charge us quarterly service fees of \$1,200. Following is a more detailed description of Schwab’s support services:

Services That Benefit You. Schwab’s institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab’s services described in this paragraph generally benefit you and your account.

Services That May Not Directly Benefit You. Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients’ accounts. They include investment research, both Schwab’s own and that of third parties. We may use this research to service all or a substantial number of our clients’ accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- Provide access to client account data (such as duplicate trade confirmations and account statements)
- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- Provide pricing and other market data
- Facilitate payment of our fees from our clients’ accounts
- Assist with back-office functions, recordkeeping, and client reporting

Services That Generally Benefit Only Us. Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events
- Consulting on technology, compliance, legal, and business needs

- Publications and conferences on practice management and business succession

Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. Schwab may also provide us with other benefits, such as occasional business entertainment of our personnel.

The availability of these services from Schwab benefits us because we do not have to produce or purchase them. We don't have to pay for Schwab's services so long as our clients collectively keep a total of at least \$10 million of their assets in accounts at Schwab. Beyond that, these services are not contingent upon us committing any specific amount of business to Schwab in trading commissions or assets in custody. The \$10 million minimum may give us an incentive to recommend that you maintain your account with Schwab, based on our interest in receiving Schwab's services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest. We believe, however, that our selection of Schwab as custodian and broker is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Schwab's services (see Select Brokerage Firms) and not Schwab's services that benefit only us. We do not believe that recommending our clients to collectively maintain at least \$10 million of those assets at Schwab in order to avoid paying Schwab quarterly service fees presents a material conflict of interest.

Order Aggregation

Most trades are mutual funds or exchange-traded funds where trade aggregation does not garner any client benefit.

Review of Accounts

Periodic Reviews

Account reviews are performed quarterly or annually by the investment advisory representatives of WCFP: James Eric Parker, Gregory Vander Top, Ivan White, Thomas White, and Misti Wiederspohn. Account reviews are performed more frequently when market conditions dictate.

Review Triggers

Other conditions that may trigger a review are changes in the tax laws, new investment information, and changes in a client's own situation.

Regular Reports

Clients receive periodic communications on a quarterly or annual basis. The written report includes information about the account holdings, investment return and fees.

Client Referrals and Other Compensation

Incoming Referrals

WCFP has been fortunate to receive many client referrals over the years. The referrals came from current clients, estate planning attorneys, accountants, employees, personal friends of employees and other similar sources. The firm does not compensate referring parties for these referrals. See the Affiliations section of the brochure for information about White & Company, PC, an affiliate of WCFP.

Referrals Out

WCFP does not accept referral fees or any form of compensation from other professionals when a prospect or client is referred to them

Other Compensation

WCFP receives an economic benefit from Schwab in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at Schwab. These products and services, how they benefit us, and the related conflicts of interest are described above (see Brokerage Practices). The availability to us of Schwab's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

Custody

Account Statements

Under government regulations, we are deemed to have custody of your assets if, for example, you authorize us to instruct Schwab to deduct our advisory fees directly from your account. We also have custody of assets if we are a trustee or personal representative for a trust or estate that is a client of WCFP. Schwab maintains actual custody of your assets. You will receive account statements directly from Schwab at least quarterly. They will be sent to the email or postal mailing address you provided to Schwab. You should carefully review those statements promptly when you receive them.

Performance Reports

Clients are urged to compare the account statements received directly from their custodians to the performance report statements provided by WCFP.

Net Worth Statements

Clients are frequently provided net worth statements and net worth graphs that are generated from our client relationship management system. Net worth statements contain approximations of bank account balances provided by the client, as well as the value of land and hard-to-price real estate. The net worth statements are used for

long-term financial planning where the exact values of assets are not material to the financial planning tasks.

Investment Discretion

Discretionary Authority for Trading

WCFP accepts discretionary authority to manage securities accounts on behalf of clients. WCFP has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold.

The client approves the custodian to be used and the commission rates paid to the custodian. WCFP does not receive any portion of the transaction fees or commissions paid by the client to the custodian on certain trades.

Discretionary trading authority facilitates placing trades in your accounts on your behalf so that we may promptly implement the investment policy that you have approved in writing.

Before assuming this authority, WCFP will ensure that you have granted authority by signing the Investment Management Agreement.

Limited Power of Attorney

A limited power of attorney is a trading authorization for this purpose. You sign a limited power of attorney so that we may execute the trades that you have approved.

Voting Client Securities

Proxy Votes

WCFP does not vote proxies on securities. Clients are expected to vote their own proxies.

When assistance on voting proxies is requested, WCFP will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client.

Financial Information

Financial Condition

WCFP does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients.

A balance sheet is not required to be provided because WCFP does not serve as a custodian for client funds or securities, and does not require prepayment of fees of more than \$500 per client, and six months or more in advance.

Business Continuity Plan

General

WCFP has a disaster prevention and recovery plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications or services.

Disasters

The disaster prevention and recovery plan covers natural disasters and man-made disasters such as loss of electrical power, loss of water pressure, fire, bomb threat, nuclear emergency, chemical event, biological event, T-1 communications line outage, Internet outage, railway accident and aircraft accident. Electronic files are backed up daily and archived offsite.

Information Security Program

Information Security

WCFP maintains an information security program to reduce the risk that your personal and confidential information may be breached.

Privacy Notice

WCFP is committed to safeguarding the confidential information of each of our clients. We hold all personal information provided to our firm in the strictest confidence. These records include all personal information that we collect from you in connection with any of the services provided by us. We have never disclosed information to nonaffiliated third parties, except as described in this Privacy Statement or as permitted by law, and do not anticipate doing so in the future. If we were to anticipate such a change in firm policy, we would be prohibited under the law from doing so without advising you first. As you know, we use health and financial information that you provide to us to help you meet your personal financial goals while guarding against any real or perceived infringements of your rights of privacy. Our policy with respect to personal information about you is contained in our privacy policy below.

We limit employee and agent access to information only to those who have a business or professional reason for knowing, and only to nonaffiliated parties as permitted by law.

We maintain a secure office and computer environment to ensure that your information is not placed at unreasonable risk.

The categories of nonpublic personal information that we collect from a client depend upon the scope of the client engagement. It will include information about your personal finances, information about your health to the extent that it is needed for the planning process, information about transactions between you and third parties, and information from consumer reporting agencies.

For unaffiliated third parties that require access to your personal information, including financial service companies, consultants and auditors, we also require strict confidentiality in our agreements with them and expect them to keep this information private. Federal and state regulators also may review firm records as permitted under law.

We do not provide your personally identifiable information to mailing list vendors or solicitors for any purpose.

Personally identifiable information about you will be maintained during the time you are a client, and for the required time thereafter that such records are required to be maintained by federal and state laws. After this required period of record retention, all such information will be destroyed.

WCFP may also share your personally identifiable information with the Certified Financial Planner Board of Standards, Inc. (CFP Board) as part of complying with the CFP Board's Code of Ethics and Professional Responsibility. If you prefer that we do not disclose your nonpublic personal information to the CFP Board you can simply opt-out of this disclosure by contacting us.

Brochure Supplement (Part 2B of Form ADV)

Education and Business Standards

White & Company Financial Planning, Inc. (WCFP) requires that advisors in its employ have a bachelor's degree or further coursework demonstrating knowledge of financial planning and tax planning. Examples of acceptable coursework include: an MBA, a CFP®, a CFA, a ChFC, JD, CTFA, EA, CPA or passing an applicable securities examination. Additionally, advisors must have work experience that demonstrates their aptitude for financial planning and investment management.

Professional Certifications

Certain Employees have earned certifications and credentials that are required to be explained in further detail.

Certified Public Accountant (CPA): Certified Public Accountants are licensed and regulated by their state boards of accountancy. In Washington State, licensing requirements include:

- Bachelor's degree or higher with 150 minimum credit hours with a concentration in accounting and business administration.
- Completion of the Uniform CPA Examination.
- Meet work experience requirements of at least 12 months providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA.

- To maintain a CPA license, Washington State requires completion of 40 hours of continuing professional education each year.

Certified Financial Planner (CFP): Certified Financial Planners are licensed by the CFP Board to use the CFP mark. CFP certification requirements:

- Bachelor's degree from an accredited college or university.
- Completion of the financial planning education requirements set by the CFP Board (www.cfp.net).
- Successful completion of the 10-hour CFP® Certification Exam.
- Three-year qualifying full-time work experience.
- Successfully pass the Candidate Fitness Standards and background check.

Personal Financial Specialist (PFS): The PFS credential demonstrates that an individual has met the minimum education, experience and testing required of a CPA in addition to a minimum level of expertise in personal financial planning. To attain the PFS credential, a candidate:

- Must hold an unrevoked CPA license
- Fulfill 3,000 hours of personal financial planning business experience
- Complete 80 hours of personal financial planning CPE credits
- Pass a comprehensive financial planning exam and be an active member of the AICPA.

THOMAS A. WHITE, CFP®, CPA, PFS

President

Educational Background: B.A., Business Administration: Emphasis in Accounting

- Year of birth: 1969
- Washington State University, 1991

Business Experience:

- Shareholder, White & Company Financial Planning, Inc., from 08/00 to Present
- Shareholder, CFP®, CPA, PFS White & Company, PC, from 06/94 to Present

Disciplinary Information: None

Other Business Activities: None

Additional Compensation: None

Supervision:

Thomas White is supervised by James Eric Parker, CPA. He reviews Thomas White's work through frequent office interactions as well as remote

interactions. He also reviews his activities through our client relationship management system.

James Eric Parker's contact information: Phone: (509) 837-6700

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None

JAMES ERIC PARKER, CPA**Vice President**

Educational Background: B.A., Business Administration: Emphasis in Accounting

- Date of birth: 02/1974
- Washington State University, 1998

Business Experience:

- Shareholder, White & Company Financial Planning, Inc., from 07/02 to Present
- Shareholder, CPA, White & Company, PC, from 10/98 to Present

Disciplinary Information: None

Other Business Activities: None

Additional Compensation: None

Supervision:

James Eric Parker is supervised by Thomas A. White, CFP®, CPA, PFS. He reviews James Eric Parker's work through frequent office interactions as well as remote interactions. He also reviews his activities through our client relationship management system.

Thomas White's contact information: Phone: (509) 837-6700

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None

IVAN L WHITE, CFP®, CPA, PFS INVESTMENT ADVISOR REPRESENTATIVE

Educational Background: B.A., Business Administration: Emphasis in Accounting

- Date of birth: 10/1943
- Washington State University, 1972

Business Experience:

- Investment Advisor Representative, White & Company Financial Planning, Inc., from 08/00 to Present
- CFP®, CPA, PFS White & Company, PC, from 06/94 to Present

Disciplinary Information: None

Other Business Activities: None

Additional Compensation: None

Supervision:

Ivan L. White is supervised by Thomas A. White, CFP®, CPA, PFS. He reviews Ivan White's work through frequent office interactions as well as remote interactions. He also reviews his activities through our client relationship management system.

Thomas White's contact information: Phone: (509) 837-6700

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None

GREGORY D VANDER TOP INVESTMENT ADVISOR REPRESENTATIVE

Educational Background: B.A., Business Administration: Emphasis in Accounting

- Date of birth: 06/1970
- Dordt College, 1992

Business Experience:

- Investment Advisor Representative, White & Company Financial Planning, Inc., from 01/08 to Present
- Staff Accountant, White & Company, PC, from 09/97 to Present

Disciplinary Information: None

Other Business Activities: None

Additional Compensation: None

Supervision:

Gregory D. Vander Top is supervised by Thomas A. White, CFP®, CPA, PFS. He reviews Gregory Vander Top's work through frequent office interactions as well as remote interactions. He also reviews his activities through our client relationship management system.

Thomas White's contact information: Phone: (509) 837-6700

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None

MISTI D WIEDERSPOHN INVESTMENT ADVISOR REPRESENTATIVE

Educational Background: Yakima Valley Community College

- Date of birth: 05/1977
- Property & Casualty Insurance License, 1999

Business Experience:

- Investment Advisor Representative, White & Company Financial Planning, Inc., from 12/06 to Present
- Executive Assistant, White & Company, PC, from 12/03 to Present

Disciplinary Information: None

Other Business Activities: None

Additional Compensation: None

Supervision:

Misti D. Wiederspohn is supervised by Thomas A. White, CFP®, CPA, PFS. He reviews Misti Wiederspohn's work through frequent office interactions as well as remote interactions. He also reviews her activities through our client relationship management system.

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None