

**Part 2A of Form ADV: *Firm Brochure***

**Wingate Planning Corporation**

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This brochure provides information about the qualifications and business practices of Wingate Planning Corporation. If you have any questions about the contents of this brochure, please contact Mark F. Greco at 781-862-7100 or [mfgreco@wingatefinancialgroup.com](mailto:mfgreco@wingatefinancialgroup.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 Wingate Planning Corporation also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number, known as a CRD number. Our firm's CRD number is 108094.

## **Item 2     Material Changes**

This Firm Brochure, dated March 30, 2012, provides you with a summary of Wingate Planning Corporation's advisory services and fees, professionals, certain business practices and policies, as well as actual or potential conflicts of interest, among other things. This Item is used to provide our clients with a summary of new and/or updated information; we will inform you of the revision(s) based on the nature of the information as follows:

1. Annual Update: We are required to update certain information at least annually, within 90 days of our firm's fiscal year end (FYE) of December 31. We will provide you with either a summary of the revised information with an offer to deliver the full revised Brochure within 120 days of our FYE or we will provide you with our revised Brochure that will include a summary of those changes in this Item.
2. Material Changes: Should a material change in our operations occur, depending on its nature, we will promptly communicate this change to clients (and it will be summarized in this Item). "Material changes" requiring prompt notification will include changes of ownership or control; location; disciplinary proceedings; significant changes to our advisory services or advisory affiliates – any information that is critical to a client's full understanding of who we are, how to find us, and how we do business.

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## **Item 4    Advisory Business**

Wingate Planning Corporation is an SEC-registered investment adviser with its principal place of business located in Massachusetts. Wingate Planning Corporation began conducting business in 1994.

Wingate Planning Corporation provides financial planning advice. Our affiliate, Wingate Financial Corporation, provides investment advice.

Listed below are the firm's principal shareholders (i.e., those individuals and/or entities controlling 25% or more of this company).

- Jeffrey Hayden White, Corporate Officer
- Arthur Felix von der Linden Jr., Corporate Officer
- Richard Snell Hayes, Corporate Officer

Wingate Planning Corporation offers the following advisory services to our clients:

### **FINANCIAL PLANNING**

Wingate Planning Corporation provides financial planning services. Financial planning is a comprehensive evaluation of a client's current and future financial state by using currently known variables to project future cash flows, asset values and withdrawal plans. Through the financial planning process, all questions, information and analysis are considered as they impact and are impacted by the entire financial and life situation of the client.

In general, the financial plan can address any or all of the following areas:

- **PERSONAL:** We review family records, budgeting, personal liability, estate information and financial goals.
- **FINANCIAL STATEMENT:** We prepare a Working Balance Sheet, listing the client's assets and liabilities.
- **LONG TERM CASH FLOW:** We model the client's income and spending for future years.
- **INVESTMENTS:** We evaluate investment portfolios and their appropriateness for meeting the client's goals and objectives.
- **DEATH & DISABILITY FUNDING:** We review the client's cash needs at death, income needs of surviving dependents, estate planning and disability income.
- **ESTATE PLANNING:** We assist the client in assessing and developing long-term strategies, including as appropriate, living trusts, wills, estate tax planning, powers of attorney, asset protection plans, nursing homes, Medicaid and elder law.

- **INSURANCE:** We review existing insurance policies to ensure proper coverage for life, health, disability, long-term care, liability, home and automobile.
- **RETIREMENT:** We analyze current strategies and investment plans to help the client achieve his or her retirement goals.
- **EDUCATION FUNDING:** We assist the client in assessing and developing a strategy and investment plan to meet education costs.

Through discussions with the client, we determine and agree on what services are appropriate.

We gather required information through in-depth personal interviews. Information gathered includes the client's current financial status, tax status, future goals, returns objectives and attitudes towards risk. We carefully review documents supplied by the client, which may include a questionnaire completed by the client, and prepare a written report. Should the client choose to implement the recommendations contained in the plan, we suggest the client work closely with his/her attorney, accountant, and insurance agent. Implementation of financial plan recommendations is entirely at the client's discretion.

Typically, the financial plan is presented to the client within six months of the agreement date, provided that all information needed to prepare the financial plan has been promptly provided.

## **Item 5 Fees and Compensation**

### **FINANCIAL PLANNING FEES**

Wingate Planning Corporation's Financial Planning fee is determined based on the nature of the services being provided and the complexity of each client's circumstances. All fees are agreed upon prior to entering into an agreement with any client. Fees are charged on either a fixed fee or on an hourly basis.

Our fixed fees typically range from \$2,500 to \$7,500, depending on the specific arrangement reached with the client.

Our hourly fees range from \$175 to \$300 per hour. Although the length of time it will take to provide a Financial Plan will depend on each client's personal situation, we will provide an estimate for the total hours at the start of the advisory relationship.

### **GENERAL INFORMATION**

***Termination of the Advisory Relationship:*** A client agreement may be canceled at any time, by either party, for any reason, upon receipt of written notice.

## **Item 6 Performance-Based Fees and Side-By-Side Management**

Wingate Planning Corporation does not charge performance-based fees.

## **Item 7 Types of Clients**

Wingate Planning Corporation provides advisory services to the following types of clients:

- Individuals (other than high net worth individuals)
- High net worth individuals

## **Item 8 Methods of Analysis, Investment Strategies and Risk of Loss**

Wingate Planning Corporation does not provide investment advice.

## **Item 9 Disciplinary Information**

We are required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management.

Our firm and our management personnel have no reportable disciplinary events to disclose.

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

Wingate Financial Corporation is an affiliated Registered Investment Advisory firm providing investment management services.

As required, any affiliated investment advisers are specifically disclosed in Section 7.A. on Schedule D of Form ADV, Part 1. (Part 1 of our Form ADV can be accessed by following the directions provided on the Cover Page of this Firm Brochure.)

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

Our firm has adopted a Code of Ethics which sets forth high ethical standards of business conduct that we require of our employees, including compliance with applicable federal securities laws.

Wingate Planning Corporation and our personnel owe a duty of loyalty, fairness and good faith towards our clients, and have an obligation to adhere not only to the specific provisions

of the Code of Ethics but to the general principles that guide the Code.

Our Code of Ethics includes policies and procedures for the review of employee quarterly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by the firm's access persons. Among other things, our Code of Ethics also requires the prior approval of any acquisition of securities in a limited offering (e.g., private placement) or an initial public offering. Our code also provides for oversight, enforcement and recordkeeping provisions.

Wingate Planning Corporation's Code of Ethics further includes the firm's policy prohibiting the use of material non-public information. While we do not believe that we have any particular access to non-public information, all employees are reminded that such information may not be used in a personal or professional capacity.

A copy of our Code of Ethics is available to our advisory clients and prospective clients. You may request a copy by email sent to [mfgreco@wingatefinancialgroup.com](mailto:mfgreco@wingatefinancialgroup.com), or by calling us at 781-862-7100.

Our Code of Ethics is designed to assure that the personal securities transactions, activities and interests of our employees will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts.

Our firm and/or individuals associated with our firm may buy or sell for their personal accounts securities identical to or different from those recommended to our clients. In addition, any related person(s) may have an interest or position in a certain security(ies) which may also be recommended to a client.

As these situations may represent actual or potential conflicts of interest to our clients, we have established the following policies and procedures for implementing our firm's Code of Ethics, to ensure our firm complies with its regulatory obligations and provides our clients and potential clients with full and fair disclosure of such conflicts of interest:

1. No principal or employee of our firm may put his or her own interest above the interest of an advisory client.
2. No principal or employee of our firm may buy or sell securities for their personal portfolio(s) where their decision is a result of information received as a result of his or her employment unless the information is also available to the investing public.
3. Our firm requires prior approval for any IPO or private placement investments by related persons of the firm.
4. We maintain a list of all reportable securities holdings for our firm and anyone associated with this advisory practice that has access to advisory recommendations ("access person"). These holdings are reviewed on a regular basis by our firm's Chief Compliance Officer or his/her designee.

5. We have established procedures for the maintenance of all required books and records.
6. All of our principals and employees must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices.
7. We require delivery and acknowledgement of the Code of Ethics by each supervised person of our firm.
8. We have established policies requiring the reporting of Code of Ethics violations to our senior management.
9. Any individual who violates any of the above restrictions may be subject to termination.

## **Item 12 Brokerage Practices**

Wingate Planning Corporation does not have any custodial relationships and therefore, does not receive any soft-dollar benefits.

## **Item 13 Review of Accounts**

### **FINANCIAL PLANNING SERVICES**

**REVIEWS:** While we recommend that clients request an annual financial planning review, typically no formal reviews will be conducted for Financial Planning unless requested.

**REPORTS:** Financial Planning clients will receive Financial Planning reports and schedules at the time of the Financial Planning review.

## **Item 14 Client Referrals and Other Compensation**

### **CLIENT REFERRALS**

Wingate Planning Corporation stopped accepting new client referrals from Solicitors on January 1, 2007, but continues to have a relationship with two clients referred to us by Solicitors prior to January 1, 2007.

As a matter of firm practice, any planning fees paid to us by clients referred by Solicitors are not increased as a result of any referral.

## **Item 15 Custody**

Our firm does not have actual or constructive custody of client accounts.



**Item 16 Investment Discretion**

As previously disclosed in Item 4 of this brochure, Wingate Planning Corporation does not provide discretionary asset management services.

**Item 17 Voting Client Securities**

Wingate Planning Corporation does not provide advisory services relative to client investment assets. Therefore, we do not vote proxies on behalf of clients.

We do not offer any consulting assistance regarding proxy issues to clients.

**Item 18 Financial Information**

Under no circumstances do we require or solicit prepayment of fees. Therefore, we are not required to include a financial statement.

Wingate Planning Corporation has no additional financial circumstances to report.