

**DISCLOSURE BROCHURE**  
**STRATEGIC PLANNING GROUP, LLC**

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**September 2015**

**Item 1 – Cover Page**

*This brochure provides information about the qualifications and business practices of Strategic Planning Group, LLC, as required by Part 2A of Form ADV. Form ADV is the form we file to register and be licensed to do business as investment advisers and comply with federal and/or state securities laws. The information presented is responsive according to the sequential “Items” of the form. If you have any questions about the contents of this brochure, please contact us at (801) 627-2200. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority.*

*Additional information about Strategic Planning Group, LLC also is available through the SEC’s website [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) (click on the link, select “investment adviser firm” and type in our firm name). Through this link you will be able to obtain our entire Form ADV.*

*Registrations do not imply any level of skill or training. The oral and written communications we provide to you, including this Brochure, is information that you should use to evaluate us (and other advisers) which are factors in your decision to hire us or to continue using our services.*

## **Item 2 – Material Changes**

Since our last Form ADV update was filed in February 2015, the following changes have been made to this disclosure brochure:

- In September 2015 the firm reached the level of Assets Under Management where it is now eligible to request registration with the U.S. Securities and Exchange Commission.
- The firm has started to manage client assets directly on a discretionary and non-discretionary basis, please refer to Item 4 – Advisory Services, Item 5 Fees and Compensation and Item 16 – Investment Discretion for more information

We will continue to ensure that you receive a summary of material changes, if any, to this and subsequent disclosure brochures within 120 days after our fiscal year ends. Our fiscal year ends on December 31 so you will receive the summary of material changes, if any, no later than April 30 each year. At that time we will also offer a copy of the most current disclosure brochure. We may also provide other ongoing disclosure information about material changes as necessary.

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## **Item 4 – Advisory Business**

### **Overview of Strategic Planning Group, LLC:**

Strategic Planning Group, LLC (SPG, us, we, our) is a registered investment adviser that is transitioning its primary regulatory authority from the states of Utah and Texas to the U.S. Securities and Exchange Commission. We are based in Ogden, Utah. We have been providing the advisory services described below since 1999. Our principal owner is Ryan E. Craner.

As of September 30, 2015, we manage client assets on a non-discretionary basis in an amount equal to \$67,456,351 and we manage \$73,732,834 client assets on a discretionary basis.

### **ASSET MANAGEMENT SERVICES**

#### **Services provided include:**

We provide the client with a written Intelligent Asset Allocation model based on Modern Portfolio Theory principles, the client's overall vision, goals and objectives, risk tolerance, income and liquidity needs, etc. SPG offers asset management services, which involves SPG providing you with continuous and ongoing supervision over your specified accounts.

We also provide the client with an Investment Policy Statement describing all factors that are at the foundation of the recommended investment portfolio, i.e., the client's vision, mission & goals, risk tolerance, income, growth and liquidity needs, time horizons, interest rate assumptions, etc. We make certain that the client thoroughly reviews and approves the Investment Policy Statement before any specific investment recommendations are implemented.

We monitor the client's investment portfolio on a regular basis with emphasis on staying in harmony with the client's goals, identifying and correcting under-performance, adjusting to major changes in market and economic conditions, keeping portfolio on the Efficient Frontier, and maintaining proper asset class allocation and percentages.

We hold investment review meetings with the client at least annually and more frequently as needed. We are available to answer the client's questions and concerns by telephone. We also keep the client informed and up-to-date regarding investment trends, tax laws, strategic planning strategies and tactics, etc. This will be done through educational workshops, a bi-annual newsletter, special letters, alerts and notices.

You must appoint SPG as your investment adviser of record on specified accounts (collectively, the "Account"). The Account consists only of separate account(s) held by qualified custodian(s) under your name. The qualified custodians maintain physical custody of all funds and securities of the Account, and you retain all rights of ownership (e.g., right to withdraw securities or cash, exercise or delegate proxy voting and receive transaction confirmations) of the Account.

The Account is managed by us based on your financial situation, investment objectives and risk tolerance. SPG actively monitors the Account and provide advice regarding buying, selling, reinvesting or holding securities, cash or other investments of the Account.

SPG will need to obtain certain information from you to determine your financial situation and investment objectives. You will be responsible for notifying us of any updates regarding your financial situation, risk tolerance or investment objective and whether you wish to impose or modify existing investment restrictions; however we will contact you at least annually to discuss any changes or updates regarding your financial situation, risk tolerance or investment objectives. We are always reasonably available to consult with you relative to the status of your Account. You have the ability to impose reasonable restrictions on the management of your accounts, including the ability to instruct us not to purchase certain securities.

It is important that you understand that we manage investments for other clients and may give them advice or take actions for them or for our personal accounts that is different from the advice we provide to you or actions taken for you. We are not obligated to buy, sell or recommend to you any security or other investment that we may buy, sell or recommend for any other clients or for our own accounts.

Conflicts may arise in the allocation of investment opportunities among accounts that we manage. We strive to allocate investment opportunities believed to be appropriate for your account(s) and other accounts advised by our firm among such accounts equitably and consistent with the best interests of all accounts involved. However, there can be no assurance that a particular investment opportunity that comes to our attention will be allocated in any particular manner. If we obtain material, non-public information about a security or its issuer that we may not lawfully use or disclose, we have absolutely no obligation to disclose the information to any client or use it for any client's benefit.

## **FINANCIAL PLANNING SERVICES**

### **Services provided include:**

We help our clients clearly identify a vision, a mission and goals. We then guide the client through the process of writing a mission statement and recording short-term and long-term goals. Attention is then given to reviewing with and educating the client with respect to all strategies and tactics that can effectively help the client achieve the vision and goals. We then narrow this list down to a final group of strategies and tactics.

Based on all of the above, we create for the client a step-by-step Strategic Plan to fully implement all strategies and tactics and systematically achieve goals and objectives.

We work in coordination with the client and the client's attorney, CPA and/or other advisors to fully implement the client's Strategic Plan. We then help the client and the client's advisors fully understand and implement all strategies and tactics, keeping the client's 100-year plan in mind.

We will make ourselves available to review and revise the client's Strategic Plans as needed in the future. We will also be available to assist the client's other advisors as needed.

## Item 5 – Fees and Compensation

It should be noted at the outset that, in addition to providing advisory services, our IARs are also registered representatives and insurance agents. Therefore, they can earn both fees when providing financial planning and consultation services and commissions when selling securities and/or insurance products. This practice presents a conflict of interest and may give our IARs an incentive to recommend investment products based on the compensation received. These conflicts will be disclosed to clients up front. However, clients can select any broker/dealer or insurance agent they wish to implement transactions.

### Asset Management Services

Fees charged for our asset management services are charged based on a percentage of assets under management, billed in advance (at the start of the billing period) on a quarterly calendar basis and calculated based on the fair market value of your account as of the last business day of the current billing period. Fees are prorated (based on the number of days service is provided during the initial billing period) for your account opened at any time other than the beginning of the billing period. If asset management services are commenced in the middle of a billing period, the prorated fee for the initial billing period is billed in arrears at the same time as the next full billing period's fee is billed.

The asset management services continue in effect until terminated by either party (i.e., SPG or you) by providing written notice of termination to the other party. Any prepaid, unearned fees will be promptly refunded by SPG to you. Fee refunds will be determined on a pro rata basis using the number of days services are actually provided during the final period.

Fees charged for our asset management services are negotiable based on the type of client, the complexity of the client's situation, the composition of the client's account (i.e., equities versus mutual funds), the potential for additional account deposits, the relationship of the client with the investment adviser representative, and the total amount of assets under management for the client.

For our asset management services, client will be charged the following annual fee based upon the amount of assets under management:

<b>Asset Level</b>	<b>Percentage of Assets Under Management per Annum</b>
Under \$250,000	1.75% per annum
\$250,001 to \$500,000	1.55% per annum
Above \$500,001	1.35% per annum

SPG believes that its annual fee is reasonable in relation to: (1) services provided and (2) the fees charged by other investment advisers offering similar services/programs. However, our annual investment advisory fee may be higher than that charged by other investment advisers offering similar services/programs. In addition to our compensation, you may also incur charges imposed at the mutual fund level (e.g., advisory fees and other fund expenses).

The investment advisory fees will be deducted from your account and paid directly to our firm by the qualified custodian(s) of your account. You will authorize the qualified custodian(s) of your account to deduct fees from your account and pay such fees directly to our firm. Our firm will send you a billing statement prior to time that fee deduction instruction is sent to the qualified custodian(s) of your account. The billing statement will detail the formula used to calculate the fee, the assets under management and the time period covered. See *Item 15 – Custody* for more details.

You should review your account statements received from the qualified custodian(s) and verify that appropriate investment advisory fees are being deducted. The qualified custodian(s) will not verify the accuracy of the investment advisory fees deducted.

Brokerage commissions and/or transaction ticket fees charged by the qualified custodian are billed directly to you by the qualified custodian. SPG does not receive any portion of such commissions or fees from you or the qualified custodian. In addition, you may incur certain charges imposed by third parties other than SPG in connection with investments made through your account including, but not limited to, mutual fund sales loads, 12(b)-1 fees and surrender charges, variable annuity fees and surrender charges, IRA and qualified retirement plan fees, and charges imposed by the qualified custodian(s) of your account. Management fees charged by SPG are separate and distinct from the fees and expenses charged by investment company securities that may be recommended to you. A description of these fees and expenses are available in each investment company security's prospectus.

#### **Fee Schedule for Financial Planning Services:**

We charge an hourly rate of \$150 per hour for Strategic Planning services. This charge may be higher or lower than fees charged by other financial advisors for the same or similar services. The client may also be quoted a project fee.

At the discretion of our IARs, the client may be quoted a fixed one time Project Fee rather than being charged at an hourly rate. This Project Fee generally ranges from \$600 to \$1,000 and is negotiable depending upon the complexity of the client's financial situation. The entire Project Fee will be due at the time the agreement for services is signed and the client will be billed directly for this Project Fee.

The client will pay 50% of quoted hourly total or quoted fixed "Project Fee" up front and the balance as the services are provided. "Hourly Total" or "Project Fees" will vary according to the amount of work necessary for each client.

If a client's Financial Plan requires the implementation of any investment tools, the client may elect to use the services of Ryan Craner in his capacity as a registered representative of CIR.

If you terminate the financial planning services after entering into an agreement with us, you will be responsible for immediate payment of any financial planning services performed by SPG prior to the receipt by SPG of your notice of termination. For financial planning services performed by SPG under an hourly arrangement, you will pay SPG for any hourly fees incurred at the rates described above. In the event that there is a remaining balance of any fees paid in advance after the deduction of fees from the final invoice, those remaining proceeds will be refunded by SPG to you.

### **Additional Fees and Expenses:**

We do not receive, directly or indirectly, any of the below listed fees charged to you. They are paid to your broker, custodian or arise out of mutual fund or other investments you hold. The fees include:

- Exchange fees;
- SEC fees;
- Advisory fees and administrative fees charged by Mutual Funds and Exchange Traded Funds (ETFs)
- Advisory fees charged by sub-advisers (if any are used for your account);
- Custodial Fees;
- Deferred sales charges (on Mutual Funds or annuities);
- Odd-Lot differentials;
- Deferred sales charges (charged by Mutual Funds);
- Transfer taxes;
- Wire transfer and electronic fund processing fees; and
- Commissions or mark-ups/mark-downs on security transactions.

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

We do not charge advisory fees on a share of the capital appreciation of the funds or securities in a client account (so-called performance based fees). Our advisory fee compensation is charged only as disclosed above (Item 5).

### **Item 7 – Types of Clients**

We provide our services to a number of individuals, including high net worth individuals. These are individuals who have large balances in investment accounts and retirement accounts (IRAs, Simple IRAs, SEP IRAs, Roth IRAs) with balances usually larger than \$200,000. These clients prefer to compensate SPG and IARs by way of a set percentage charged to a wrap account instead of commissions or transaction based compensation.

### **MINIMUM ACCOUNT BALANCES**

Financial Planning Services can be provided regardless of account values.

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

#### **Analysis:**

Our securities analysis methods include fundamental, charting, technical and cyclical methods of analysis. We also use an additional method of investment analysis known as Intelligent Asset Allocation or Modern Portfolio Theory. This method involves a sophisticated and detailed asset allocation method created by William Sharpe and Harry Markowitz whom were both awarded the Nobel Prize for Economics in 1991. Model mutual fund and variable annuity asset allocation portfolio programs, provided by a number of institutional investment managers and strategists, may be used when managing client assets.



**Investment Strategies:**

The investment strategies we use to implement any investment advice given to clients includes long-term purchases (securities held for at least one year) and short-term purchases (securities sold within a year). However, our investment strategies do not include trading (securities sold within 30 days), short sales, margin transactions or option writing.

**Sources of Information:**

The sources of information we use include financial newspapers and magazines, research materials prepared by third parties, corporate rating services, inspections of corporate activities, and annual reports, prospectuses and Securities and Exchange Commission (SEC) filings. We use additional sources of information when making investment recommendations to clients. These additional sources include: historical data and records of investment performance over the last 50 to 75 years, conference calls and face-to-face meetings with the top money managers from large mutual fund companies, and forward analysis based on forecasts, trends and past experience.

**Risk of Loss:**

All investments in securities include a risk of loss of your principal (invested amount) and any profits that have not been realized (the securities are not sold to “lock in” the profit). You should understand and be prepared to face losses and be able to bear them. If you cannot, then our services are probably not appropriate for you. As you know, stock markets and bond markets fluctuate substantially over time. In addition, as recent global and domestic economic events have indicated, performance of any investment is not guaranteed and that past performance is not necessarily a predictor of future performance.

**Item 9 – Disciplinary Information**

We do not have any legal, financial or other “disciplinary” item to report to you. We are obligated to disclose any disciplinary event that would be material to you when evaluating us to initiate a client/adviser relationship, or to continue a client/adviser relationship with us.

This statement applies to our firm, and to every employee.

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

Our IARs sell securities products in their separate capacities as registered representatives. They also sell insurance products in their separate capacities as independently licensed insurance agents. They earn sales commissions when selling securities and insurance products. Some of the advice offered by the IARs may involve investments in mutual fund products. Load and no-load mutual funds may pay annual distribution charges sometimes referred to as 12(b)-1 fees. IARs may receive a portion of these 12(b)-1 fees from some investment companies in their separate capacities as registered representatives. Clients should be aware that these 12(b)-1 fees come from fund assets, and thus, indirectly from client's assets. Receipt of these fees could represent an incentive for registered representatives to recommend funds with 12(b)-1 fees or higher 12(b)-1 fees over funds with no fees or lower fees, therefore creating a potential conflict of interest.

From time to time we may receive expense reimbursement for travel and/or marketing expenses from distributors of investment and/or insurance products. Travel expense reimbursements are typically a result of attendance at due diligence and/or investment training events hosted by product sponsors. Marketing expense

reimbursements are typically the result of informal expense sharing arrangements in which product sponsors may underwrite costs incurred for marketing such as advertising, publishing and seminar expenses. Although receipt of these travel and marketing expense reimbursements are not predicated upon specific sales quotas, the product sponsor reimbursements are typically made by those sponsors for whom sales have been made or it is anticipated sales will be made.

We may enter into agreements with solicitors (referring parties) to refer clients to us. If a referred client enters into an investment advisory agreement with us, a cash referral fee is paid to the referring party that is based upon a percentage of the client advisory fees that are generated. The referral agreements between any referring party and the firm will not result in any charges to clients in addition to the normal level of advisory fees charged. The referral agreements between the firm and referring parties are in compliance with SEC regulations. While no current affiliations with solicitors exist at this time, we may establish these relationships in the near future. When and if this occurs, the appropriate documentation will be filed with the appropriate regulatory authority.

Our president and CEO, Ryan Craner, is a registered representative of Cambridge Investment Research, Inc. (CIR), a securities broker-dealer. You may work with your investment adviser representative in his or her separate capacity as a registered representative of CIR. When acting in his or her separate capacity as a registered representative, your investment adviser representative may sell, for commissions, general securities products such as stocks, bonds, mutual funds, exchange-traded funds, and variable annuity and variable life products to you. As such, your investment adviser representative may suggest that you implement investment advice by purchasing securities products through a commission-based brokerage account in addition to or in lieu of a fee-based investment-advisory account. This receipt of commissions creates an incentive to recommend those products for which your investment adviser representative will receive a commission in his or her separate capacity as a registered representative of a securities broker-dealer. Consequently, the objectivity of the advice rendered to you could be biased. You are under no obligation to use the services of our representatives in this separate capacity or to use CIR and can select any broker/dealer you wish to implement securities transactions. If you select our representatives to implement securities transactions in their separate capacity as registered representatives, they must use CIR. Prior to effecting any transactions, you are required to enter into a new account agreement with CIR. The commissions charged by CIR may be higher or lower than those charged by other broker/dealers. Ryan spends 45% of his time on registered representative activity. Ryan spends approximately 30% of his time on adviser representative activity.

Ryan Craner is also the president of Capital Concepts Financial Corp. Ryan spends approximately 5% of his workweek managing this company.

Our investment advisor representatives are independently licensed to sell insurance products through various insurance carriers. When a Strategic Plan calls for insurance products, they may be sold through the IARs in this separate capacity. They may earn sales commissions for the sale of these insurance tools. Ryan spends approximately 10% of his time on this activity.

Strategic Planning Group may refer clients to Strategic Tax Planning for tax preparation. Strategic Tax Planning is owned and operated by Kristin Kippen, EA. Strategic Planning Group and Strategic Tax Planning are not affiliated. With signed authorization, Strategic Planning Group and Strategic Tax Planning may share client information.

Strategic Planning Group may refer clients to Richard H. Bradley for legal documents such as trusts and wills. The costs for these documents will be passed on to the client. Some aspects of the client's financial plan may be discussed with Mr. Bradley.

The foregoing business relationships may present conflicts of interest and may give our IARs an incentive to recommend investment products based on the compensation received. These conflicts will be disclosed to clients up front and all efforts will be made to put the interest of the client first.

SPG does not recommend or select other investment advisers for its clients

SPG does not recommend or select third-party advisers.

SPG does not charge performance based fees.

## **Item 11 – Code of Ethics**

We and our IARs may buy or sell securities or have an interest or position in a security for their personal account which they also recommend to clients. We shall continue to be in compliance with The Insider Trading and Securities Fraud Enforcement Act of 1988. As these situations may represent a potential conflict of interest, it is our policy that no IARs shall prefer his or her own interest to that of the advisory client.

No person employed by us may purchase or sell any security prior to a transaction or transactions being implemented for an advisory account. IARs shall not buy or sell securities for their personal account(s) where their decision is derived, in whole or in part, by information obtained as a result of his or her employment unless the information is also available to the investing public upon reasonable inquiry. We maintain a list of all securities holdings for it and all IARs, which is reviewed on a regular basis by a principal of the firm. This log is available for client review upon request.

According to the Investment Advisers Act of 1940, 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. In addition, an investment advisor has a duty of utmost good faith to act solely in the best interest of each of its clients. We and our IARs have a fiduciary duty to all clients.

While we are not currently registered with the SEC, we have adopted certain policies and procedures that are consistent with the rules applicable to SEC-registered investment advisers. According to the *Investment Advisers Act of 1940*, an investment advisor is considered a fiduciary. As a fiduciary, an investment advisor has a duty of utmost good faith to act solely in the best interest of each of our clients. We and our advisory representatives have a fiduciary duty to all clients. As a result, we have established a Code of Ethics which all advisory representatives must read and acknowledge. We and our advisory representatives' fiduciary duty to clients is considered the core underlying principle of our Code of Ethics and represents the expected basis for all advisory representatives' dealings with clients. We have the responsibility to make sure that the interests of clients are placed ahead of us or our advisory representatives' own investment interests. We shall conduct business in an honest, ethical and fair manner. We comply with all federal securities laws at all times. Full disclosure of all material facts and potential conflicts of interest will be provided to clients prior to services being conducted. All advisory representatives have a responsibility to avoid circumstances that might negatively affect or appear to affect the advisory representatives' duty of complete loyalty to their clients. This section is only intended to provide current clients and potential clients with a description of our Code of Ethics. If current clients or potential clients wish to review our Code of Ethics in its entirety a copy may be requested from any of our advisory representatives and a copy will be provided promptly.

## **Item 12 – Brokerage Practices**

Clients are under no obligation to act on the financial planning recommendations of SPG. If the firm assists in the implementation of any recommendations, we are responsible to ensure that the client receives the best execution possible. Best execution does not necessarily mean that clients receive the lowest possible commission costs but that the qualitative execution is best. In other words, all conditions considered, the transaction execution is in your best interest. When considering best execution, we look at a number of factors besides prices and rates including, but not limited to:

- Execution capabilities (e.g., market expertise, ease/reliability/timeliness of execution, responsiveness, integration with our existing systems, ease of monitoring investments)
- Products and services offered (e.g., investment programs, back office services, technology, regulatory compliance assistance, research and analytic services)
- Financial strength, stability and responsibility
- Reputation and integrity
- Ability to maintain confidentiality

We exercise reasonable due diligence to make certain that best execution is obtained for all clients when implementing any transaction by considering the back office services, technology and pricing of services offered.

### **Brokerage Recommendations**

If we assist you in the implementation of any recommendations, Cambridge Investment Research will be used as the introducing broker dealer for your account and National Financial Services (NFS) will be used as the custodian for your account. Our investment adviser representatives are also registered representatives of Cambridge Investment Research.

### **Directed Brokerage**

Clients are allowed to select the broker-dealer that will be used for their accounts. Clients directing the use of a particular broker/dealer or other custodian must understand that we may not be able to obtain the best prices and execution for the transaction. Under a client-directed brokerage arrangement, clients may receive less favorable prices than would otherwise be the case if the client had not designated a particular broker/dealer or custodian. Directed brokerage account trades are generally placed by SPG after effecting trades for other clients of SPG. In the event that a client directs SPG to use a particular broker or dealer, SPG may not be authorized to negotiate commissions and may be unable to obtain volume discounts or best execution. In addition, under these circumstances a disparity in commission charges may exist between the commissions charged to clients who direct SPG to use a particular broker or dealer versus clients who do not direct the use of a particular broker or dealer.

### **Soft Dollar Benefits**

An investment adviser receives soft dollar benefits from a broker-dealer when the investment adviser receives research or other products and services in exchange for client securities transactions or maintaining an account balance with the broker-dealer.

SPG does not have a soft dollar agreement with a broker-dealer or a third-party.

### **Handling Trade Errors**

SPG has implemented procedures designed to prevent trade errors; however, trade errors in client accounts cannot always be avoided. Consistent with its fiduciary duty, it is the policy of SPG to correct trade errors in a manner that is in the best interest of the client. In cases where the client causes the trade error, the client is responsible for any loss resulting from the correction. Depending on the specific circumstances of the trade error, the client may not be able to receive any gains generated as a result of the error correction. In all situations where the client does not cause the trade error, the client is made whole and any loss resulting from the trade error is absorbed by SPG if the error is caused by SPG. If the error is caused by the broker-dealer, the broker-dealer is responsible for handling the trade error. If an investment gain results from the correcting trade, the gain remains in the client's account unless the same error involved other client account(s) that should also receive the gains. It is not permissible for all clients to retain the gain. SPG may also confer with a client to determine if the client should forego the gain (e.g., due to tax reasons).

SPG will never benefit or profit from trade errors.

### **Block Trading Policy**

Investment advisors may elect to purchase or sell the same securities for several clients at approximately the same time when they believe such action may prove advantageous to clients. This process is referred to as aggregating orders, batch trading or block trading. SPG does not engage in block trading.

It should be noted that implementing trades on a block or aggregate basis may be less expensive for client accounts; however, it is our trading policy to implement all client orders on an individual basis. Therefore, we do not aggregate or "block" client transactions. Considering the types of investments we hold in advisory client accounts, we do not believe clients are hindered in any way because we trade accounts individually. This is because we develop individualized investment strategies for clients and holdings will vary. Our strategies are primarily developed for the long-term and minor differences in price execution are not material to our overall investment strategy.

### **Agency Cross Transactions**

Our associated persons are prohibited from engaging in agency cross transactions, meaning we cannot act as brokers for both the sale and purchase of a single security between two different clients and cannot receive compensation in the form of an agency cross commission or principal mark-up for the trades.

## **Item 13 – Review of Accounts**

Accounts are reviewed on a semiannual or annual basis (depending on account size) by Ryan E. Craner and more frequently than semiannually in response to client inquiries, major events, certain economic or market conditions, etc. Accounts are compared against the "efficient frontier" as well as standard performance benchmarks. Accounts are also measured against current and forecasted market and economic conditions. Accounts are reviewed in relation to how well they are matching the client's goals and objectives.

Clients receive investment reports on a semiannual or annual basis (depending on account size). These reports include a summary of all investment positions, the previous period's value and the current period's ending value. The report shows total income from each investment position for the period and year-to-date. The report compares each investment position's performance to standard benchmarks. The report summarizes all investment positions indicating the investment name, the value as of the reporting period end and the

percentage as a part of the overall portfolio. We urge you to compare the account reports you receive from us with the account statements received from any qualified custodians of your assets.

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

Our IARs sell securities products in their separate capacities as registered representatives. They also sell insurance products in their separate capacities as independently licensed insurance agents. They earn sales commissions when selling securities and insurance products. Some of the advice offered by the IARs may involve investments in mutual fund products. Load and no-load mutual funds may pay annual distribution charges sometimes referred to as 12(b)-1 fees. IARs may receive a portion of these 12(b)-1 fees from some investment companies in their separate capacities as registered representatives. Clients should be aware that these 12(b)-1 fees come from fund assets, and thus, indirectly from client's assets. Receipt of these fees could represent an incentive for registered representatives to recommend funds with 12(b)-1 fees or higher 12(b)-1 fees over funds with no fees or lower fees, therefore creating a potential conflict of interest.

From time to time we may receive expense reimbursement for travel and/or marketing expenses from distributors of investment and/or insurance products. Travel expense reimbursements are typically a result of attendance at due diligence and/or investment training events hosted by product sponsors. Marketing expense reimbursements are typically the result of informal expense sharing arrangements in which product sponsors may underwrite costs incurred for marketing such as advertising, publishing and seminar expenses. Although receipt of these travel and marketing expense reimbursements are not predicated upon specific sales quotas, the product sponsor reimbursements are typically made by those sponsors for whom sales have been made or it is anticipated sales will be made.

We may enter into agreements with solicitors (referring parties) to refer clients to us. If a referred client enters into an investment advisory agreement with us, a cash referral fee is paid to the referring party that is based upon a percentage of the client advisory fees that are generated. The referral agreements between any referring party and the firm will not result in any charges to clients in addition to the normal level of advisory fees charged. The referral agreements between the firm and referring parties are in compliance with SEC regulations. While no current affiliations with solicitors exist at this time, we may establish these relationships in the near future. When and if this occurs, the appropriate documentation will be filed with the appropriate regulatory authority.

The foregoing business relationships may present conflicts of interest and may give our IARs an incentive to recommend investment products based on the compensation received. These conflicts will be disclosed to clients up front and all efforts will be made to put the interest of the client first.

#### **Item 15 – Custody**

Custody, as it applies to investment advisors, has been defined by regulators as having access or control over client funds and/or securities. In other words, custody is not limited to physically holding client funds and securities. If an investment adviser has the ability to access or control client funds or securities, the investment adviser is deemed to have custody and must ensure proper procedures are implemented.

SPG is deemed to have custody of client funds and securities whenever SPG is given the authority to have fees deducted directly from client accounts. However, this is the only form of custody SPG will ever maintain. It should be noted that authorization to trade in client accounts is not deemed by regulators to be custody.

For accounts in which SPG is deemed to have custody, we have established procedures to ensure all client funds and securities are held at a qualified custodian in a separate account for each client under that client's name. Clients or an independent representative of the client will direct, in writing, the establishment of all accounts and therefore are aware of the qualified custodian's name, address and the manner in which the funds or securities are maintained. Finally, account statements are delivered directly from the qualified custodian to each client, or the client's independent representative, at least quarterly. Clients should carefully review those statements and are urged to compare the statements against reports received from SPG. When clients have questions about their account statements, they should contact SPG or the qualified custodian preparing the statement.

### **Item 16 – Investment Discretion**

When providing asset management services, the Firm maintains trading authorization over your Account and can provide management services on a discretionary basis. When discretionary authority is granted, we will have the authority to determine the type of securities and the amount of securities that can be bought or sold for your portfolio without obtaining your consent for each transaction.

If you decide to grant trading authorization on a non-discretionary basis, we will be required to contact you prior to implementing changes in your account. Therefore, you will be contacted and required to accept or reject our investment recommendations including:

- The security being recommended
- The number of shares or units
- Whether to buy or sell

Once the above factors are agreed upon, we will be responsible for making decisions regarding the timing of buying or selling an investment and the price at which the investment is bought or sold. If your accounts are managed on a non-discretionary basis, you need to know that if we are not able to reach you or you are slow to respond to our request, it can have an adverse impact on the timing of trade implementations and we may not achieve the optimal trading price.

You will have the ability to place reasonable restrictions on the types of investments that may be purchased in your Account. You may also place reasonable limitations on the discretionary power granted to us so long as the limitations are specifically set forth or included as an attachment to the client agreement.

### **Item 17 – Voting *Client* Securities (i.e., Proxy Voting)**

We and our investment advisor representatives will not vote proxies on behalf of clients. Clients are instructed to read through the information provided with the proxy document and make a determination based on the information provided. In some instances, upon request from the client, the investment advisor representatives may provide clarifications based on their understanding of issues presented in the proxy materials. However, the investment advisor representatives will not provide recommendations on proxy issues. Clients will be solely responsible for all proxy voting decisions.

### **Item 18 – Financial Information**

This *Item 18* is not applicable to this brochure. SPG does not require or solicit prepayment of more than \$1200 in fees per client, six months or more in advance. Therefore, we are not required to include a balance

sheet for the most recent fiscal year. We are not subject to a financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients. Finally, SPG has not been the subject of a bankruptcy petition at any time.



**Strategic Planning Group, LLC**  
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**September 2015**

**This brochure supplement provides information about Ryan E. Craner that supplements the Strategic Planning Group, LLC brochure. You should have received a copy of that brochure. Please contact Strategic Planning Group or Ryan E. Craner if you did not receive Strategic Planning Group's brochure or if you have any questions about the contents of this supplement.**

**Additional information about Ryan E. Craner is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**Educational and Business Experience**

**Ryan Craner (b. 1963)**

Ryan has many years of experience in investments and investment strategy and has been recommending financial products since May 1985. Ryan Craner (b.1963) has been a registered representative since July 1988. He was a registered representative with First Western Advisors from 04/1994 to 06/1998, Securities America Inc. from 7/1998 to 06/2011 and Girard Securities from 06/2011 to 06/2014 prior to joining Cambridge Investment Research in 06/2014. Ryan has been educated on many tax and investment concepts and has no formal education after high school.

In January of 1999, Mr. Craner founded the Strategic Planning Group, LLC, a Strategic Planning firm. In August of 1999, Strategic Planning Group, LLC became a Registered Investment Advisory Firm with the State of Utah with Ryan E. Craner as President and CEO. Prior to the formation of the Strategic Planning Group, LLC, Mr. Craner was President and founder of Capital Concepts Financial Corp. Capital Concepts Financial Corp. has operated as a financial services firm in the State of Utah since 1985.

**Disciplinary Information**

Ryan Craner has no legal or disciplinary events in his past. Clients and prospective clients can view the CRD records (registration records) for Ryan Craner through the SEC's Investment Adviser Public Disclosure (IAPD) website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) or FINRA's BrokerCheck database online at [www.finra.org/brokercheck](http://www.finra.org/brokercheck). The CRD number for Ryan Craner is 1752377.

**Other Business Activities**

In addition to being an investment adviser representative (hereafter "IA Rep") of Strategic Planning Group, LLC, (hereafter "SPG") Ryan Craner is a registered representative with Cambridge Investment Research, Inc. (hereafter "CIR") and may also sell securities to any client for commission. Ryan spends 45% of his time on this registered representative activity.

Ryan E. Craner is separately licensed as a registered representative with Cambridge Investment Research, Inc., a registered securities broker/dealer, member of the Financial Industry Regulatory Authority (FINRA) and the Securities Investors Protection Corporation (SIPC). When acting in his separate capacity as a registered representative of CIR, he may sell, for commissions, general securities products such as stocks, bonds, mutual funds, exchange-traded funds, and variable annuity and variable life products to advisory clients. As such, Ryan Craner may suggest that advisory clients implement investment advice by purchasing securities products through a commission-based CIR account in addition to a SPG advisory account.

The receipt of commissions creates a potential incentive for Ryan Craner to recommend those products for which he will receive a commission. Consequently, the objectivity of the advice rendered to clients may be biased. Ryan Craner controls for this potential conflict of interest by discussing with clients the advantages and disadvantages of establishing a fee-based account through SPG versus establishing a commission-based account through CIR. SPG does not require its advisor representatives to encourage clients to implement investment advice through CIR.

Clients are never obligated or required to establish accounts through SPG or CIR. However, if a client does not choose to accept Ryan Craner's advice or decides not to establish an account through CIR, Ryan Craner may not be able to provide advisory services to the client. Clients should understand that, due to certain regulatory constraints, Ryan Craner, in his capacity as a Cambridge representative must place all purchases and sales of securities products in commission-based brokerage accounts through CIR or its other approved institutions.

Ryan Craner is also licensed as an independent insurance agent in Utah. As an IA Rep of Strategic Planning Group, LLC, Ryan Craner may make recommendations on insurance products and may also, as an independent insurance agent, sell those recommended insurance products to advisory clients. When such recommendations or sales are made, a conflict of interest exists as Ryan Craner may earn insurance commissions for the sale of those products, which may create an incentive to recommend such products. SPG requires that Ryan Craner disclose this conflict of interest when such recommendations are made. Also, SPG requires Ryan Craner to disclose that advisory clients may purchase recommended insurance products from other insurance agents not affiliated with SPG. Ryan spends approximately 10% of his workweek on this business activity.

Ryan is the president of Capital Concepts Financial Corp. Ryan spends approximately 5% of his workweek managing this company.

Ryan is also a notary public commissioned in the State of Utah and in this capacity receives fees from Richard H. Bradley (see Item 10 page 6) for legal document notarizations.

### **Additional Compensation**

This item is not applicable to Ryan Craner or Strategic Planning Group, LLC.

### **Supervision**

Strategic Planning Group, LLC is owned and operated by Ryan Craner. Ryan monitors the investment recommendations and investment strategy given by him directly to clients. Investment recommendations may be given in writing or given verbally to clients and are always written and documented in each client's file.

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**September 2015**

**This brochure supplement provides information about John M. Park that supplements the Strategic Planning Group, LLC (“Strategic Planning Group”) disclosure brochure. You should have received a copy of that brochure. Please contact Ryan E. Craner at (801) 627-2200 if you did not receive Strategic Planning Group’s brochure or if you have any questions about the contents of this supplement.**

**Additional information about John M. Park is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**Educational Background and Business Experience**

**John M. Park (b. 1985)**

John Park has been a financial advisor since February 2013 and an Investment Advisor Representative since May 2014. He has been a registered representative of Strategic Planning Group since December 2014. He also has experience in the banking industry, starting in August 2007. From 08/2007 to 02/2010 he worked as a Customer Service Manager at Zions Bank. From 02/2012 to 02/2013 he worked as a co-manager at US Bank. John worked as a financial advisor from 02/2013 to 05/2014 with Raymond James Financial Services, Inc. and an investment advisor representative from 02/2014 to 05/2014 with Raymond James Financial Services Advisors, Inc. In October 2014, John became a registered representative and investment advisor representative for Cambridge Investment Research. John received his associate’s degree from Weber State University in 2010.

**Disciplinary Information**

John M. Park has no legal or disciplinary events in his past. Clients and prospective clients can view the CRD records (registration records) for John Park through the SEC’s Investment Adviser Public Disclosure (IAPD) website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) or FINRA’s BrokerCheck database online at [www.finra.org/brokercheck](http://www.finra.org/brokercheck). The CRD number for John M. Park is 6166417.

**Other Business Activities**

In addition to being an investment adviser representative (hereafter “IA Rep”) of Strategic Planning Group, LLC, (hereafter “SPG”) John Park is a registered representative with Cambridge Investment Research, Inc. (hereafter “CIR”) and may also sell securities to any client for commission. John spends 80% of his time on this registered representative activity.

John M. Park is separately licensed as a registered representative with Cambridge Investment Research, Inc., a registered securities broker/dealer, member of the Financial Industry Regulatory Authority (FINRA) and the Securities Investors Protection Corporation (SIPC). When acting in his separate capacity as a registered

representative of CIR, he may sell, for commissions, general securities products such as stocks, bonds, mutual funds, exchange-traded funds, and variable annuity and variable life products to advisory clients. As such, John Park may suggest that advisory clients implement investment advice by purchasing securities products through a commission-based CIR account in addition to a SPG advisory account.

The receipt of commissions creates a potential incentive for John Park to recommend those products for which he will receive a commission. Consequently, the objectivity of the advice rendered to clients may be biased. John Park controls for this potential conflict of interest by discussing with clients the advantages and disadvantages of establishing a fee-based account through SPG versus establishing a commission-based account through CIR. SPG does not require its advisor representatives to encourage clients to implement investment advice through CIR.

Clients are never obligated or required to establish accounts through SPG or CIR. However, if a client does not choose to accept John Park's advice or decides not to establish an account through CIR, John Park may not be able to provide advisory services to the client. Clients should understand that, due to certain regulatory constraints, John Park, in his capacity as a Cambridge representative must place all purchases and sales of securities products in commission-based brokerage accounts through CIR or its other approved institutions.

John M. Park is also licensed as an independent insurance agent in Utah. As an IA Rep of Strategic Planning Group, LLC, John M. Park may make recommendations on insurance products and may also, as an independent insurance agent, sell those recommended insurance products to advisory clients. When such recommendations or sales are made, a conflict of interest exists as John M. Park may earn insurance commissions for the sale of those products, which may create an incentive to recommend such products. SPG requires that John M. Park disclose this conflict of interest when such recommendations are made. Also, SPG requires John M. Park to disclose that advisory clients may purchase recommended insurance products from other insurance agents not affiliated with SPG. John spends approximately 10% of his workweek on this business activity.

### **Additional Compensation**

This item is not applicable to John Park or Strategic Planning Group, LLC.

### **Supervision**

Ryan Craner is the Chief Compliance Officer of Strategic Planning Group. He is responsible for overseeing and enforcing the firm's compliance programs that have been established to monitor and supervise the activities and services provided by the firm and its representatives, including John M. Park. Ryan Craner can be contacted at (801) 627-2200.