

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

Item 1 Cover Page



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**Firm Brochure**  
(Part 2A of Form ADV  
April 25, 2019

This Brochure provides information about the qualifications and business practices of *PlanAndAct*. If you have any questions about the contents of this Brochure, please contact us at the phone or email listed above. 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.

*PlanAndAct* is a State of Colorado Registered Investment Adviser. Registration of an investment advisor does not imply any level of skill or training. The oral and written communications of an advisor provide you with information about which you determine to hire or retain an advisor.

Additional information about *PlanAndAct* is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The searchable IARD # is 148453

## Item 2 Material Changes

Since the last annual amendment filed on 3/30/2018, the following material changes have been made:

*Item 4- Advisory Business:* Registration with the state of Colorado and withdrawal of SEC registration which relied on rule 203-2(e) under the Investment Advisers Act of 1940. Added description of advisory services other than interactive website.

*Item 5 – Fees & Compensation:* Added new fees.

*Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss:* Expanded and updated for new developments in academic research, new systemic risks identified in capital markets and product innovation by financial engineers.

*Item 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading:* Updated with addition of investment management services

*Item 12 – Brokerage Practices:* Updated with addition of investment management services

*Item 13 - Review of Accounts:* Updated with addition of investment management services

*Item 14 – Client Referrals and Other Compensation:* Updated with addition of investment management services

*Item 15 – Custody:* Updated with addition of investment management services

*Item 16 – Investment Discretion:* Updated with addition of investment management services

*Item 17 – Voting Client Securities:* Updated with addition of investment management services

*Item 19 – Requirements for State-Registered Advisers:* Added for state registration

*Part 2B - Brochure Supplement:* Added for state registration and addition of investment management services

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#### Item 4 Advisory Business

Plan & Act (PAA) was founded in 2008 by David Ron, Robert J. Schumann, Larry J. Soukup and Eldad Taub under the legal name of FinancialAdvice4Me, LLC. The business purpose is to deliver affordable, fee-only, financial planning to the majority of Americans who have a little or no wealth and/or do not have sufficient investable assets to manage and/or desire fiduciary advice to build wealth and convert it into retirement income. You are interviewed in an online intelligent “chat”. A rules-based “expert system” synthesizes your data into a comprehensive and progressive “next step” financial plan. The outcome of our financial progress planning services is to build and protect wealth in the most effective manner for the eventual conversion into inflation protected, lifetime retirement income. In short, passive income is the outcome. The expert system is based on the application of the science of financial economics to at least 30,000 cases. The system is continually updated for current tax law and new innovations by financial engineers. (See Item 8)

Until this filing, PAA was an SEC-registered internet investment adviser relying on rule 203A-2(e) under the Investment Advisers Act of 1940. An internet investment adviser provides investment advice to you exclusively through an interactive website. The rule defines “interactive website” as a website in which computer software-based models or applications provide investment advice to you based on personal information provided by you through the website.

PAA is now a Colorado registered investment advisor offering coaching and investment management services in addition to interactive financial planning.

##### *Principal Owners*

Ownership is as follows:

TKT, LTD	81.30%
Financial Stages, LLC	17.94%
Online365, LTD	.76%

##### *Types of Advisory Services*

###### Free Assessment

We start by giving you a free assessment. You create an account on our interactive website [www.planandact.com](http://www.planandact.com). Then you select the **Free Assessment** option and answer 6-12 questions. The assessment shows your wealth position on a 10-stage financial life cycle and compares it with your age position. This assessment is comparable to doctor’s checkup or your annual physical. We use key financial ratios and data from the Federal Reserve to measure your financial health or wellness. The Financial Life Cycle and underlying ratios are like a roadmap allow you to visualize where you are now, where you want to be and the gap. The financial plan shows you how to close the gap.

We help you close the gap with **Financial Progress Service Agreement** which delivers the appropriate set of services for your position and desired outcomes. The four levels of service are:

- SILVER - Do-It-Yourselfers in any financial life stage
- GOLD - If you are in the Building the Foundation stage
- PLATINUM - If you are in the Early Accumulation stage
- DIAMOND – If you are in the Rapid Accumulation, Financial Independence, Conservation or Distribution stages.

###### Financial Planning

Depending on your level of services, we will give you:

- 1) A two 2-minute starter budget (aka spending plan) based on Federal Reserve averages for households like yours. You can create multiple budget scenarios from the starter budget.
- 2) A spending tracker to measure your performance and reduce impulsive spending.
- 3) Six foundational financial lessons
- 4) The 5-year financial plan to close the gap

## 5) Interactive progress reporting

We give you six “levers” for accelerating your accumulation of wealth. We let you visualize the impact of moving each of the levers and the power of moving all six at the same time. The levers which you control are:

- 1) Your income
- 2) Your expenses, including taxes and missed opportunity costs.
- 3) Your savings rate
- 4) Expected return on your investments
- 5) Debt reduction strategy
- 6) Real estate/home leverage

There may be anywhere from 10-30 actionable recommendations for building and conserving wealth more efficiently and effectively. The plan includes asset allocation models with a list of suitable no-load mutual funds and Exchange Traded Funds (ETF) to implement the investment advice.

The most common topics include, but are not limited to the following:

1. Explanation of age and wealth positions on the ten-stage financial life cycle and strategy for each position
2. Calculation of net worth
3. Appropriate accumulation, conservation or distribution strategies
4. Reducing income taxes
5. Budgeting and balancing cash flows
6. Real estate analysis
7. Wealth/debt restructuring
8. Life insurance analysis
9. Retirement readiness
10. Retirement income
11. Children’s education
12. Liquidity (emergency fund)
13. Portfolio analysis
14. Risk management
15. Asset allocation models to match your outcomes and risk profile
16. Investor education and principles for security selection

### Investment Management

We do not offer portfolio management without a financial plan. As stated previously, the assessment and plan are like a doctor’s assessment and plan of treatment. The investment advice is like the doctor’s prescription. And the investment management is analogous to the pharmacist filling the prescription.

You can implement your plan and investment advice by yourself. Or we can assist you with the implementation of the investment advice. We will help you set up and transfer accounts, do rollovers, Roth conversions, etc. on our institutional platform at TD Ameritrade. There we will give you access to no-load Vanguard and Dimensional mutual funds. We will execute trades with your approval.

We recommend primarily the series of Dimensional Target Date Retirement Income Funds. These funds incorporate asset allocation glide paths for continuous time risk hedging and pricing of risky capital assets. They incorporate the Nobel prize winning concepts of life cycle and multifactor investing. Fund operating expenses range from an industry low of 0.19 to 0.26%. These unique retirement income funds won the Mutual Fund Industry’s 2017 Innovative Retirement Product of the Year award. They are an outstanding example of the new tools being created by financial engineers like Nobel Laureate Robert Merton. For more details see *Item 8*.

Continuing education on the science financial economics and investing will be provided in your plan and by an Investment Advisor Representative (IAR)

### Results Coaching

To ensure that you are always making progress we offer group and individual coaching via telephone, webinars and video meetings. Why is coaching with a focus on results so important?

- 1) While we share many commonalities, we are also unique in our circumstances, goals, beliefs and values.
- 2) As we age so do the outcomes or results we want in our lives.
- 3) Increasing wealth also increases the complexity in our lives. We call it Financial Independence or Freedom because it means we have an almost unlimited number of choices in all areas of life, including financial economics.

After you electronically sign the Financial Progress Service Agreement, you will be given access to numerous tools and services suitable to your needs and the level of service you selected.

You should know that in performing our services, we are not required to verify any information received from you or other professionals, and you expressly authorize us to rely on the information as provided.

### Item 5 Fees and Compensation

Our fees match the four levels of service described in Item 4 under Financial Progress Service Agreement.

- A. **Silver** – Flat fee of \$29/month or \$299/year. No advisor or planner support
- B. **Gold** – Flat fee of \$95/month or \$995/year. Group advisor and planner support.
- C. **Platinum** – Flat fee of \$159/month or \$1700/year which includes investable assets up to \$100,000. Group plus advisor/planner support
- D. **Diamond** – Flat fee of \$159/month or \$1700/year plus a declining marginal advisory fee.
  1. \$100,001 - \$500,000 0.75% Increased individual advisor/planner support
  2. \$500,001 - \$1,000,000 0.50% Unlimited individual advisor/planner support
  3. \$1,000,001 - \$5,000,000 0.20%
  4. \$5,000,001 - \$10,000,000 0.10%

This platform is not suitable for individuals with investable assets greater than \$10,000,000

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

We do not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client) and do not engage in side-by-side management.

### Item 7 Types of Clients

We serve primarily individuals and trusts. We may also license our technology, systems and content to others including investment advisors, financial wellness providers, record-keepers, custodians, non-profit institutions and businesses desiring to offer financial wellness services to customers.

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

#### **Methods of Analysis**

Our methodology is based on the key ideas contributed to the theory of finance by Robert C. Merton. Merton was the Research Assistant of Paul Samuelson, the first American to win a Nobel Prize (1970) in economics. In a remarkable series of papers (1970-1974) which included his doctoral thesis while he was teaching at MIT, Robert Merton planted seeds of ideas that would shape the field of finance for the next 45 years. These papers incorporated uncertainty into a widely accepted model of lifetime dynamic consumption. Uncertainty is another word for risk. Dynamic consumption refers to how an individual's spending varies over time. One of Merton's last papers incorporated the portfolio selection decision in continuous time. Portfolio selection refers to the best way to diversify a portfolio and hedge its expected risks against its expected returns. Continuous time refers to the idea that consumer/investor decisions are made continuously, not just at one point in time. Merton's Intertemporal Capital Asset Pricing Model (ICAPM) provided the theoretical rationale for firms like ours to offer such tools as the

Financial Life Cycle, the Wealth Pyramid, Functional Asset Allocation, Endogenous Risk Analysis and a family of hedging portfolios that can be combined to match your goals and needs. The ICAPM also provided the theoretical justification for a multifactor investment strategy. The research he is most known for—and the discovery that led to his Nobel prize in 1997—is the model for options pricing.

Bob Merton's ideas and research continue to shape every area of finance, including financial planning and investment advice for individuals like you. Samuelson once compared Merton's influence to Isaac Newton's impact on physics. A classmate and student, recently compared Merton's continuing influence on financial economics to that of both Newton and Einstein.

The multi-factor asset pricing model explains 97-99% of portfolio performance. The evidence is overwhelming that the capital markets for pricing publicly traded securities are just as efficient as free markets for other goods and services. After accounting for transaction costs, the laws of arithmetic would have to be suspended for investors to outperform the market because the market has no cost to invest in itself. All investors are the market. This means investing is a zero-sum game. A company like Boeing creates value when it gathers materials like aluminum, steel and cloth and uses those materials to build an automobile or airplane. Analyzing that company's financial data and then purchasing its securities adds ZERO value to the company. It just incurs costs that reduce investor return. That's what academics mean when they say "Investing is a zero sum game." For all those reasons we do not analyze securities for mispricing because science has demonstrated that it adds little or no value after transaction costs.

### Investment Strategies

Our investment strategies are to capture market returns with broad, low cost, passively managed, multifactor based mutual funds that also incorporate life stage risk hedging. . As mentioned previously, the Dimensional Target Date Retirement Income Funds were designed for specifically this purpose under the direction of Robert Merton. Dimensional funds incorporate what are commonly called 1) the market factor, 2) the size factor, 3) the value factor and 4) the quality/profitability factor. To reduce transaction costs, the momentum factor is taken into account when buying or selling individual securities for each fund.

If Dimensional funds are not available, we recommend no-load Vanguard or Fidelity funds and Exchange Traded Funds (ETF) that will capture the recommended asset class returns at the lowest possible cost.

### Risk of Loss

Investing in securities involves risk of loss that you should be prepared to bear. Some common and more familiar risks faced by investors are individual company risk, market risk, inflation risk, interest rate risk, default risk, sequence of returns risk, currency risk, political risk, mortality risk, morbidity risk and longevity risks. Unrecognized systemic risk can trigger global financial collapse as it did in the Great Depression of 1928-1939 and the Great Recession of 2007-2009. Unexpected systemic risk is usually created by financial innovation.

The Wealth Pyramid and Functional Asset Allocation incorporate strategies to hedge the risks that are inherent in all investment products and solutions. Inflation protected bonds can be purchased to hedge future income against inflation. In certain cases, a Qualified Longevity Annuity Contract can be purchased to hedge longevity risk.

We quantify your unique investor risk profile with a 10 factor Endogenous Risk Analysis which results in an individualized risk score. This number measures 1) the financial risk you can *afford*, 2) the financial risk *required* to achieve your goals and 3) the risk of loss you can psychologically *tolerate*. We use this risk score to design your asset allocation strategy. Another reason we recommend DFA Target Date Retirement Income Funds is that they have also been designed by Merton Miller to manage risk in continuous time.

You should know that in spite of our best efforts to hedge or mitigate risk, not every investment decision or recommendation made by us will be profitable. We cannot warrant or guarantee any particular level of account performance, or that an account will be profitable over time. We can only say that we will use the best evidence-based solutions of which we are aware, to give you the highest probability of success. You must be aware that you as the investor always assume the risk of loss.

## Item 9 Disciplinary Information

Registered Investment Advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of PAA or the integrity of PAA's management. We have not experienced any legal or disciplinary events.

## Item 10 Other Financial Industry Activities and Affiliations

Robert Schumann is a minority owner of Cambridge Financial Advisors, LLC, a Colorado limited liability company which provides financial planning and investment advisory services. There are 5 partners and Investment Advisor Representatives working in this business with two support staff persons. The firm is primarily a financial planning firm working with individuals and has about \$95 million Assets Under Management. An average of 20-30 hours per week are spent in this activity.

Robert Schumann is the sole owner of Cambridge Pension Advisors, LLC, a Colorado limited liability company which provides pension consulting, pension solutions and employee wellness services to small businesses and non-profit organizations. An average of 10 hours per week are spent in this activity.

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

We seek to avoid material conflicts of interest. Accordingly, neither PAA nor its Investment Adviser Representatives nor its team members receive any third party direct monetary compensation (i.e., commissions, 12b1 fees, or other fees) from brokerage firms (custodians) or mutual fund companies. Although we believe that our business methodologies, ethics rules, and adopted policies are appropriate to eliminate, or at least mitigate material conflicts of interest, and to appropriately manage any material conflicts of interest that may remain, you should be aware that no set of rules can possibly anticipate or relieve all material conflicts of interest. In any event, we will disclose to you any material conflict of interest relating to PAA, its representatives, or any of its employees which could reasonably be expected to impair the rendering of unbiased and objective advice.

### **Code of Ethics**

We have adopted a Code of Ethics for all supervised persons of the firm. This Code of Ethics describes our high standard of business conduct and fiduciary duty to its you. The Code of Ethics includes provisions relating to the confidentiality of your personal information, a prohibition against insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons of PAA must acknowledge the terms of the Code of Ethics annually, or as amended. Additionally, we follow the 21 practice standards established by the nonprofit Center for Fiduciary Excellence (CEFEX) for fiduciary Advisors ([www.cefex.org](http://www.cefex.org)).

### **Participation or Interest in Client Transactions and Personal Trading**

PAA and its related persons, as a matter of policy, do not recommend to you, or buy or sell in your accounts, securities in which the firm or its related persons have a material financial interest. PAA or individuals associated with us may buy and sell some of the same securities for our own accounts that we buy and sell for you. When appropriate, we or individuals associated with us, will purchase or sell securities for you *before* purchasing or selling the same securities for our own accounts. In some cases, we may buy or sell securities for our own accounts for reasons not related to the strategies recommended and accepted by you. The Code of Ethics is designed to assure that these personal securities transactions will not interfere with making decisions in your best interest while at the same time, allowing employees to invest for their own accounts.

Certain classes of securities, such as open-ended mutual funds, are designated as exempt transactions, meaning employees may trade these without prior permission because such trades would not materially interfere with your best interest. Nonetheless, because the Code of Ethics permits employees to invest in the same securities as you, there is a possibility that employees might somehow benefit from your market activity. Accordingly, when applicable, employee trading is monitored under the Code of Ethics, and actions are taken to reasonably prevent conflicts of interest between us and you.



We will disclose to you any material conflict of interest relating to PAA, its representatives, or any of its employees, which could reasonably be expected to impair the rendering of unbiased and objective advice. PAA will notify you in advance of its policies in respect to officers trading for their own accounts including the potential conflict of interest that arises when recommending securities to you in which PAA or its principals hold a material position.

#### Item 12 Brokerage Practices

Custodians compete for adviser business by offering “soft dollar” benefits such as research and other products and services. These benefits may include lower transaction costs, access to proprietary research services, newsletters and other brokerage services not available to the retail public. Even though most of these soft dollar benefits may flow through to the client, they do create a conflict of interest for PAA. PAA is offered research and other eligible brokerage services which are defined as “soft dollar benefits” as a result of the custodian which it recommends. Because we believe in passive management and use primarily low cost, DFA and Vanguard mutual funds or ETFs, most of these research services offer little or no value to PAA or to you.

The custodian recommended will generally be TD Ameritrade Institutional, a division of TD Ameritrade, Inc., member FINRA/SIPC. Factors influencing the decision include TD Ameritrade’s low costs, financial strength, best execution policy, breadth of no-load mutual funds, no transaction fee products (in particular, indexed ETFs), reduced transaction fee for Dimensional funds, adviser and client support and account statements. As far as we were able to determine, this decision will result in paying competitive commissions and other transaction related expenses across all accounts. We do not receive any portion of these commissions and other transaction related expenses charged by the custodian.

Every 3-5 years we review TDA’s fees and services and compare them to other custodians to determine if our selection of TDA is still in your best interest.

#### Item 13 Review of Accounts

PAA is responsible for monitoring accounts and making changes when needed. A review or change may be triggered by a change in your situation, a change in your financial plan, a vendor review, new information about a particular investment or new academic research that warrants a change in investment strategy. Currently the reviewer is Robert J. Schumann.

#### Item 14 Client Referrals and Other Compensation

PAA is a fee-only, financial planning and investment advisory firm and does not sell insurance or investment products. Nor does it accept commissions as a result of any product or security it recommends. PAA does not pay referral or finder's fees, nor does it accept such fees from other firms.

#### Item 15 Custody

We will not take physical custody of your accounts, securities or money. We will, with your written approval, make arrangements with your account custodian to withdraw our fee from investment accounts on which we are listed as an adviser. In these cases we would be considered to have constructive custody of your funds. Depending on the situation and engagement contract, we will supply you with an invoice detailing the fee calculation.

You will receive at least quarterly statements from the custodian that holds and maintains your investment assets. These statements will show all distributions, including the amount of our fee. We may also provide you with periodic reports on your account. These reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities. We urge you to carefully review such statements and compare official custodian records to any statements that we may provide to you or any personal records that you maintain. Notify us promptly of any discrepancies.

#### Item 16 Investment Discretion

Investment discretion means “having, the sole or shared authority (whether or not that authority is exercised) to determine what securities or other assets to purchase or sell on behalf of the account.” We do not accept discretion over individual accounts, including individual retirement accounts within a 401k plan. You are responsible for deciding whether or not to follow any of our recommendations.

#### Item 17 Voting Client Securities

As a matter of firm policy and practice, PAA does not have any authority to and does not vote proxies on your behalf. You retain the responsibility for receiving and voting proxies for any and all securities maintained in your accounts. Because we recommend mutual funds, it is unlikely that you will receive proxies. If you do, you can call us with questions.

#### Item 18 Financial Information

Registered Investment Advisers are required to provide you with certain financial information or disclosures about your financial condition. PAA has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to you, and has not been the subject of any bankruptcy proceeding.

#### Item 19 Requirements for State-Registered Advisers

As a general standard, an undergraduate degree and relevant fiduciary and investment advisory experience are required. In addition, any individual involved in determining or giving investment advice to you will be licensed or registered in the states in which they provide investment advisory service.

#### **Robert J. Schumann**

##### **Licenses and Education**

- ☐ BA – Northwestern College (1974)
- ☐ MDiv – Wisconsin Lutheran Seminary (1978)
- ☐ MA – University of Wisconsin-Madison (1982)
- ☐ MBA – The Ohio State University, Columbus, OH (1996)
- ☐ CFP® - Certified Financial Planner® designee
- ☐ AIFA® - Accredited Investment Fiduciary Analyst
- ☐ PPC® - Professional Plan Consultant

##### **Business Experience**

- ☐ Member, Senior Advisor and Chief Compliance Officer, Cambridge Financial Advisors, LLC, Buena Vista, CO, November 2007 to present. Approximate hours per month: 80.
- ☐ Chief Advice Officer and Chief Compliance Officer, FinancialAdvice4Me, LLC d/b/a Plan&Act, Buena Vista, CO. September 2008 to present. Approximate hours per month 20.
- ☐ Owner, Cambridge Pension Advisors, LLC, Salida, CO, April 2011 to present. Approximate hrs per mo 10.
- ☐ Owner, Cambridge Financial Advisors, LLC, Gahanna, OH – 1997 to 2007 (Financial Planner)
- ☐ Registered Representative, Aid Association for Lutherans and AAL Capital Management, Inc., Columbus, OH – 1994 to 1999 (Personal Financial Advisor-sales of insurance and investment products).

Neither PAA nor any management personnel of PAA have ever been found liable or required to pay any award for an arbitration claim or other civil proceeding related to an investment related activity. PAA does not have any relationship or arrangement with any issuer of securities.

**Part 2B of Form ADV: *Brochure Supplement***

Item 1 Cover Page



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Contact Information

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Date: April 25, 2019

This Brochure Supplement provides information about the qualifications and business practices of Cambridge Pension Advisors, LLC. If you have any questions about the contents of this Supplement, please contact us at the phone or email listed above. The information in this Supplement has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Cambridge Pension Advisors, LLC is a State of Colorado Registered Investment Adviser. Registration of an investment advisor does not imply any level of skill or training. The oral and written communications of an adviser provide you with information about which you determine to hire or retain an adviser.

Additional information about Robert J. Schumann is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).  
The searchable CRD # is 2518448

## Item 2 Educational Background and Business Experience

As a general standard, an undergraduate degree and relevant fiduciary, financial planning and investment advisory experience are required. In addition, any individual involved in determining or giving investment advice to clients will be licensed or registered in the states in which they provide investment advisory service.

### **Robert J. Schumann**

#### **Licenses and Education**

- ☐ BA – Northwestern College (1974)
- ☐ MDiv – Wisconsin Lutheran Seminary (1978)
- ☐ MA – University of Wisconsin-Madison (1982)
- ☐ MBA – The Ohio State University, Columbus, OH (1996)
- ☐ CFP® - Certified Financial Planner® designee
- ☐ AIFA® -Accredited Investment Fiduciary Analyst
- ☐ PPC® - Professional Plan Consultant

#### **Business Experience**

- ☐ Member, Senior Advisor and Chief Compliance Officer, Cambridge Financial Advisors, LLC, Buena Vista, CO, November 2007 to present. Approximate hours per month: 20
- ☐ Chief Advice Officer and Chief Compliance Officer, FinancialAdvice4Me, LLC d/b/a Plan&Act, Salida CO. September 2008 to present. Approximate hours per month 10.
- ☐ Owner, Cambridge Pension Advisors, LLC, Buena Vista, CO, April 2011 to present. Approximate hours per month 10.
- ☐ Owner, Cambridge Financial Advisors, LLC, Gahanna, OH – 1997 to 2007 (Financial Planner)
- ☐ Registered Representative, Aid Association for Lutherans and AAL Capital Management, Inc., Columbus, OH – 1994 to 1999 (Personal Financial Advisor-sales of insurance and investment products).

## Item 3 Disciplinary Information

Neither PAA nor any management personnel of PAA have ever been found liable or required to pay any award for an arbitration claim or other civil proceeding related to an investment related activity.

## Item 4 Other Business Activities

In addition to the businesses listed above, Robert J. Schumann is regularly solicited for personal development and life coaching services. *TheBridge*, a Colorado based Limited Liability company has been formed to turn this into a for profit exercise, but currently services are usually offered pro bono. Hours in this activity average 4-6/week

## Item 5 Additional Compensation

The adviser does not receive any additional compensation (or economic benefit) for providing advisory services.

## Item 6 Supervision

Robert J. Schumann is currently the only Investment Adviser Representative. He is also the Chief Compliance Officer. There are no other employees or independent contractors.

## Item 7 Requirements for State-Registered Advisers

Same as ADV Part 2, Item 19.