



## Plenty Financial RIA, LLC

### Form ADV Part 2A Appendix 1 Wrap Fee Program Brochure

**December 2024**

This "**Brochure**" provides information about the qualifications and business practices of Plenty Financial RIA, LLC. (hereinafter "**Plenty**," "**we**," "**us**," "**our**" or the "**Firm**"). If you have any questions about the contents of this Brochure, please contact our Chief Compliance Officer ("**CCO**"), Emily Luk, by email at [compliance@withplenty.com](mailto:compliance@withplenty.com). Information in this Brochure has not been approved or verified by the U.S. Securities and Exchange Commission (the "**SEC**") or by any state securities authority.

Registration as an investment adviser does not imply that Plenty or any of its principals or employees possesses a particular level of skill or training in the investment advisory business or any other business.

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

**Item 2: Material Changes**

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Since the Firm's last annual amendment on March 30, 2023, the Brochure has updated its Fees in Item 4 and additional risk factors have been included in Item 6 to include tax-loss harvesting, among others.

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#### Item 4: Advisory Business

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Plenty Financial RIA, LLC. (hereinafter "**Plenty**," "**we**," "**us**," "**our**" or the "**Firm**") is organized as a Delaware limited liability company with a principal place of business in San Francisco, CA. Plenty is principally owned by Plenty Financial, Inc. which is principally owned by Emily Luk and Christopher Allen.

Plenty was founded to democratize access to financial products and tools that accelerate wealth building. Plenty Financial, Inc. provides an interactive web-based personal financial management and educational platform to consumers through a fee-based model. Wholly owned subsidiary Plenty Financial RIA, LLC leverages industry-leading technology to provide advisory services ("Advisory Services" or "Services") in the form of software-first financial planning and investment advisory services for Subscribers ("Subscribers" or "Clients"). Our investment advice guidelines are discretionary and available to our Clients via an ongoing fee-based model.

#### Program Description

This Wrap Fee Program Brochure is provided to help Clients understand the nature of the services offered by the Firm, whether the services offered by Plenty are right for the Client, and the potential conflicts of interest associated with the Client's participation in the Plenty Wrap Fee Program.

Clients should review this Wrap Fee Program Brochure carefully. The discretionary investment management services are offered through a wrap fee program (the "Plenty Wrap Fee Program") described herein.

Plenty Financial, Inc. provides interactive educational financial planning tools to help individuals and couples create their own goals-based financial plan and understand their cash flow. Plenty collects information about a Client's age, family, financial condition, employment status, investment goals/objectives, time horizon, and risk tolerance exclusively through an interactive website. Clients are then guided through estimates of their financial goals and given the ability to use an interactive tool to understand the impact of different saving and investment plans for each of their goals. Once an individual has made a decision to move forward with a given plan, Plenty provides investment recommendations including money-market funds or an algorithm-generated stock/bond portfolio provided by its subadvisor. Typically, individual stocks or domestic exchange traded funds ("ETFs") are utilized for domestic equity exposure and ETFs are utilized for international equity and treasury/bond exposure. This asset mix also may vary depending on the type of account a Client is using to invest (individual, joint, retirement, etc.). Client's investment objectives, financial profile, and risk tolerance impact the options Clients are initially shown, though a Client may override recommendations at any point and select their own risk tolerance-based allocation for Plenty to implement. Once a Client decides to move forward, the investment accounts are managed by the subadvisor.

Client accounts will have the ability to make reasonable restrictions for their account and the subadvisor's software will monitor Clients' accounts on an ongoing basis and periodically rebalance as changes in market conditions, additions, or withdrawals in the Client account and or a change in Client's financial

circumstances occurs.

In general, wrap fee programs allow Clients to pay a single fee (the "Wrap Fee") which covers advisory fees (including subadvisory fees), trading commissions, fees for brokerage, and other administrative and advisory services provided by an investment adviser, broker, and/or the custodian. Clients are generally not charged separate fees for each component of the total services. Because wrap fee program advisers typically absorb Client transaction fees, an incentive exists to limit trading activities in the wrap fee account. Depending on the wrap fee account, Clients may also pay more for using a wrap fee program than they would for using non-wrap fee program services.

### **Types of Advisory Services and Investment Strategy**

Plenty provides interactive web-based financial planning and educational tools that allow individuals to visually see the impact of different investing and savings plans. Clients are given options between money market funds or stock and bond portfolios (sometimes represented by ETFs), and the ability to see the impact on risk and return. These stock and bond portfolio recommendations are made through the subadvisor's proprietary algorithmic-based technology to provide discretionary asset management services through a web application.

A Client may update his or her risk profile at any time by updating the risk responses accessible through a Client's account online. Clients also are able to set their risk tolerance on a goal-by-goal basis. Client assets are used to purchase the securities that align to the Client's corresponding target asset allocation within the recommended portfolio or Client selected portfolio.

Investment services provided by Plenty and its sub-advisory partner are designed to encourage higher rates of saving and investing in non-retirement and retirement accounts. At user onboarding, individual Clients undergo a financial situation review and risk assessment. Clients may optionally provide values-preferences that lead to the inclusion / exclusion of different companies or industries in their stock-based portfolios. Clients have the option to additionally create individual investment goals with unique time horizons, risk tolerance, and liquidity needs that lead to the programmatic curation of a custom investment portfolio for each goal. For all investment portfolios, Clients may choose to override the algorithm-based portfolios.

### **Fees and Compensation**

The fees applicable to Clients are set forth in detail in each investment advisory agreement. A brief summary of such fees is provided below.

#### ***Advisory Fees***

Plenty's Clients pay a combination of:

- a) Subscription fee ("Subscription Fee") to Plenty Financial, Inc. for non-advisory services including financial wellness and educational content.
- b) Wrap Fee based on the amount of Assets under Management ("AUM") in your account for the advisory services described in this Item 4.

The Subscription Fee provides access to the personal financial management tools

and financial educational tools and is collected by Plenty Financial, Inc. The Subscription Fee is up to \$100 annually per Client. At this time, the subscription fee is not being collected. Plenty Financial, Inc. reserves the right to waive or modify the subscription fee, at its sole discretion. Please visit our [website](#) for more information on the subscription fee.

The asset-based wrap fees are 0.20% of AUM, billed in arrears, and calculated based on the Client's average daily balance in the prior month. The wrap fee is collected by Plenty Financial RIA's subadvisor, Atomic Invest LLC. The wrap fee is based on the amount of assets in your account. As a general matter, the more money you invest with us the more fees you will pay; therefore, we have an incentive to encourage you to increase your assets in your account. The annual wrap fee includes investment advisory and subadvisory services (portfolio construction, rebalancing, and automated tax-loss harvesting)<sup>1</sup>, custody services and brokerage commissions, and therefore may be higher than a typical asset-based advisory fee that does not include the additional services described. Plenty reserves the right to waive or modify the Wrap Fee for any Client, at its sole discretion.

### ***Other Types of Fees or Expenses***

The Firm is responsible for and shall pay, or cause to be paid, all of their own ordinary administrative and overhead expenses, including, without limitation, all costs and expenses related to rent, furniture, fixtures, equipment, office supplies, clerical expenses and all salaries, bonuses and benefits paid to, or on behalf of, personnel of the Firm.

Neither the Firm nor its employees accept compensation, including sales charges or service fees, from any person for the sale of securities or other investment products.

Plenty may charge additional fees to Clients for specifically requested services or irregular occurrences that are not included in the wrap fee program. All such fees are outlined in the Advisory Agreement.

**Personal Financial Management and Education Platform:** Plenty Financial, Inc. provides an interactive financial planning and educational web platform to Clients to link their external accounts and see their financial lives in a single place. The tools enable individuals to explore potential future financial scenarios including having children, retirement, getting married, college funding and purchasing a home, and provide investment related services (provided through Plenty Financial RIA and its subadvisor) for reaching their goals. The software-first experience enables individuals to forego a traditional interview-based onboarding experience. Clients are empowered with the tools to understand the financial consequences of different decisions, and given the ability to create their own plans to reach their financial goals. Clients choose to implement decisions entirely at their own discretion, and should consult with tax or financial advisors if there are additional personal circumstances that are not captured by Plenty's platform. While the data used in financial models is believed to be reliable, Plenty cannot ensure the accuracy or completeness of data provided by third parties (including the subadvisor) or Client s.

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<sup>1</sup> Please refer to Item 6 for risk factors related to tax-loss harvesting and potential wash sales.

## **Item 5: Types of Clients**

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Plenty is an internet-only advisory firm that uses a software-first approach to support individuals in financial planning and investment decisions.

Our investment advisory subscribers, as mentioned in Item 4 above, undergo verification to confirm that they are natural persons who are:

- 1) Legal US Residents or US Citizens;
- 2) Maintain and link a verified funding source with a US bank or financial institution to their Plenty Account;
- 3) Pass identify verification protocols; and
- 4) Clients are 18 and above.

The minimum initial account size is \$100.

Clients may choose to open joint accounts with another individual; additional identity verification is completed upon doing so.

## **Item 6: Portfolio Manager Selection and Evaluation**

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### **Selecting/Reviewing Portfolio Manager**

Plenty evaluates a variety of information about subadvisors, which includes the subadvisor's public disclosure documents, materials supplied by the subadvisor themselves and other third-party analyses it believes are reputable. To the extent possible, Plenty seeks to assess the subadvisor's investment strategies, past performance, and risk results in relation to its Clients' individual portfolio allocations and risk exposure. Plenty also takes into consideration the subadvisor's management style, returns, reputation, financial strength, reporting, pricing, and research capabilities, among other factors.

On an ongoing basis, Plenty monitors the performance of those accounts being managed by the subadvisor. Plenty seeks to ensure the subadvisor's strategies and target allocations remain aligned with its Clients' investment objectives and overall best interests. No guarantees can be made that a Client's financial goals or objectives will be achieved. Further, no guarantees of performance can be offered.

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

We do not accept performance-based fees – that is, fees based on a share of capital gains on or capital appreciation of the assets of a Client. Furthermore, we do not manage both accounts that are charged a performance-based fee and accounts that are charged another type of fee, such as an hourly or flat fee or an asset-based fee.

### **Method of Analysis, Investment Strategies and Risk of Loss**

Plenty provides investment services through a website. This entails the use of a subadvisor-provided algorithm-based portfolio and digital services, rather than in-person investment services. These automated investment solutions are customized to each Client and based on individual characteristics, such as the Client's age, risk tolerance, income, and current assets, among others. Clients are encouraged to update their account with any change in their objectives, risk tolerance, or other pertinent information, as that information factors into the algorithmic based portfolio recommendations.

The descriptions set forth in this Brochure of specific advisory services that we offer to Clients, should not be understood to limit in any way our activities. We may offer any advisory services, engage in any investment strategy and make any investment, including any not described in this Brochure, that we consider appropriate. The investment strategies we pursue may be speculative and could entail substantial risks. Clients should be prepared to bear a substantial loss of capital. There can be no assurance that the investment objectives of any Client will be achieved.

### ***Risk Management***

The Firm focuses on diversification, limited exposure, position sizing, and management to mitigate risk on posted trade services, and for general portfolio guidelines. Plenty collects information about a Client's investment time horizon, risk preferences, and investment goal size.

### ***Risk of Loss***

Investing in securities involves risk of loss that Clients should be prepared to bear. All investment programs have certain risks that are borne by the investor. The investment approach constantly keeps the risk of loss in mind. Investors face, at minimum, the following investment risks:

***Market Risk:*** The risk that the price of a security, bond, or Fund may change in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors, independent of a security's particular underlying circumstances. For example, political, economic, and social conditions may trigger market events.

***Tax-loss harvesting:*** Tax-loss harvesting involves certain risks, including the risk that the new investment could have higher costs than the original investment and may introduce portfolio tracking error into your accounts. There may also be unintended tax implications. Prospective Clients should consult with their tax or legal advisor prior to utilizing any tax-loss harvesting strategy. Neither Plenty nor its subadvisor provide tax or legal advice. Tax-loss harvesting may not be suitable for every investor and may have limited or no impact in retirement accounts. For example, tax-loss harvesting may not materially benefit investors in low-income tax brackets.

***Tax-loss harvesting and wash sale rule:*** The wash sale rule prohibits the realization of a loss from selling a security if a "substantially identical" security is purchased 30 days before or after the sale. The wash sale rule also applies when the purchase is made in a different account or even the account of a spouse. In



general, tax-loss harvesting seeks to avoid potential wash sales. Tax-loss harvesting techniques implemented by Plenty are not able to avoid wash sales associated with assets held or transactions conducted in accounts that are held outside of Plenty. This limitation includes outside accounts that may be linked in Plenty's website for planning purposes, but that are not connected for Plenty to provide investment advice. Although the tax-loss harvesting algorithm available through the subadvisor seeks to avoid wash sales, situations may occur where tax-loss harvesting may result in a wash sale. Clients are responsible for their own analysis of whether wash sales may have occurred across the totality of their accounts.

**Advisory Risk:** Clients who choose to implement Plenty's investment services are not guaranteed investment performance. There is no guarantee that Plenty's services will be successful. Further, Plenty, through our subadvisor, recommends stock and bond investment portfolios. While the third-party subadvisor partner has been vetted, there can be no assurance that services generated will be profitable.

**Software Risk:** Plenty's services are delivered entirely through software. While all software is tested and vetted before implementation, the software may not always perform as intended, especially in unusual circumstances. Internet outages, third party hacks, malware, and other events may impact Plenty's software and related services. Plenty has continuous monitoring, detection, and correction protocols to mitigate but not eliminate this risk. In addition, Plenty uses a third-party's software for investment portfolio recommendations and this exposes Plenty to third-party software risk.

**Security Selection Risk:** The risk that individual securities may decline in value due to negative news or fundamental developments specific to the issuer. The rationale for selecting the security either may not be correct or the market may not recognize the value.

**Stock Investments:** Stock markets are volatile and can decline significantly in response to adverse issuer, political, regulatory, market, or economic developments. Different parts of the market can react differently to these developments. In addition, stock investments are subject to risk related to market capitalization as well as company-specific risk.

**ETF Risks:** Shares of an ETF may trade on an exchange at prices at, above, or below their most recent NAV. The NAV represents the value of each share's portion of the ETF's underlying assets and cash at the end of the trading day. The per-share NAV of an ETF is calculated at the end of each business day. The trading prices of an ETF's shares fluctuate continuously throughout the trading day based on market supply and demand, which may not correlate to NAV. The trading prices of an ETF's shares may differ significantly from NAV during periods of market volatility, which may, among other factors, lead to the ETF's shares trading at a premium or discount to NAV. Investment policies, management fees and other information can be found in the individual ETF's prospectus. Please read the prospectus carefully before you invest. Investors should consider the investment objectives, risks, charges and expenses of each ETF carefully before investing. This and other information are contained in each ETF's prospectus, which may be obtained by visiting the ETF sponsor's website. Please read each prospectus carefully before you invest.

**Volatility Risk:** Plenty's investment services rely upon historical securities data; past performance is no guarantee of future results and any historical returns, expected returns, or probability projections may not reflect actual future performance.

**Tax and Regulatory Risk:** Performance of investments may be impacted by government legislation or regulation including, changes in securities trading regulation, changes in the tax code, changes in tax reporting, and changes in income characterization.

**Liquidity Risk:** The risk that an investor will be unable to buy or sell a security at a reasonable price at a certain point in time. This may occur if there is a limited quantity available or only a few market makers willing to trade. For example, U.S. Treasuries are quite liquid, while an equity security subject to a regulatory halt would be illiquid.

**Inflation Risk:** The risk that the value of a dollar will not be worth as much as anticipated. That is, inflation will be higher than expected.

**Values Based Investing Risk:** Clients who choose to modify their investment portfolios for the explicit inclusion or exclusion of specific companies, themes, or industries may result in lower returns compared to non-modified portfolios.

**Portfolio Allocation and Rebalancing:** The subadvisor portfolio recommendations may not successfully achieve an investor's goals for a variety of reasons, including unexpected market events or trends that the algorithm does not anticipate, as well as inaccurate, incomplete, or otherwise faulty data used by the algorithm and/or provided by the investor. While the subadvisor seeks to continually improve its algorithmic system, it does not guarantee it will result in positive returns on investment. In addition, when the subadvisor rebalances the portfolios, it is possible that the system could error and fail to execute a requested trade.

Some of the additional general risks that clients should consider include, but are not limited to:

**Software & Technology Risk:** Once Plenty gathers clients' interests, goals, and risk tolerance, the Firm's investment analysis software uses this information to suggest multiple investment portfolios that a client may select. Account rebalances are also executed programmatically using the subadvisor's proprietary software platform. Clients should note the following risks:

- i. Software may still make incorrect assumptions about a client's financial situation. There is always a possibility that the simulator may experience technical malfunctions that would cause its recommendations to be inaccurate.
- ii. The software can only base its output on the input from the client. As such, the software's output is only as accurate as the data the client inputs.
- iii. The output that the software generates may not assess all of the client's particular situation. Special circumstances, qualitative characteristics, and other intangible components of a client's personal background that are not captured by the software may cause the software's assumptions to be incorrect.

Clients will have tax risk exposure if there are future changes in taxation legislation that impact their net returns.

#### **Item 7: Client Information Provided to the Portfolio Managers**

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At account opening, Clients provide their age, financial condition, employment status, investment objectives, time horizon, and risk tolerance. Plenty's goal based financial planning software enables Clients to create a saving and investing plan that helps them plan to meet their goals. Should they choose to invest with Plenty, Clients have the option of money market accounts or stock and bond (or ETFs containing stocks and bonds) based portfolios. These portfolios are provided by Plenty's subadvisor's algorithm which constructs, revises, and recommends portfolios with target asset allocations. Client accounts will be managed in accordance with their risk profile and the subadvisor will use its internal algorithm to monitor each Client's account performance on an ongoing basis and rebalance the portfolio as required by changes in market conditions or other factors. On a periodic basis, Plenty asks Clients to update their profile.

#### **Item 8: Client Contact with Portfolio Managers**

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We provide our investment services exclusively through the website. You may contact the web application's customer service during normal business hours for technical assistance or to answer any questions regarding your account. For the avoidance of doubt, our customer service team is not permitted to provide you with investment advice.

#### **Item 9: Additional Information**

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##### **Disciplinary Information**

There are no legal or disciplinary events that are material to a Client's evaluation of our advisory business or the integrity of our management.

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

Neither the Firm nor any of its management persons are registered, and do not have an application pending for registration, as a broker-dealer, broker-dealer representative, futures commission merchant, commodity pool operator, commodity pool trading adviser, or an associated person of the foregoing entities.

##### **Code of Ethics**

The Firm has adopted a Code of Ethics (the "Code") pursuant to Rule 204A-1 under the Advisers Act. The Firm believes that high ethical standards are essential if the Firm is to earn and maintain the confidence of the Firm's investment partners.

The Code is designed to: (i) establish guidelines for professional conduct and personal trading procedures; (ii) prevent improper personal trading by the Firm employees; (iii) prevent improper use of material, non-public information about security recommendations made by the Firm or security holdings of clients; (iv) identify conflicts of interest; and (v) provide a means to resolve any actual or

potential conflict in favor of firm clients, and other areas as described fully in the Code.

Compliance with the Code is a condition of employment. Every employee must acknowledge the terms of the Code of Ethics annually, or as amended.

Any employee found to have engaged in improper or unlawful activity faces appropriate administrative and legal action. It is the responsibility of each employee to ensure that they and those they manage are conducting business professionally and are complying with the procedures and policies governing the Firm's collective responsibility. Any employee becoming aware of others engaged in wrongdoing or improper conduct must immediately report such activity to the Firm's CCO. Failure to do so may result in additional action being taken against that individual.

The Firm endeavors to ensure that the investment management and overall business of the Firm complies with applicable U.S. federal and state securities laws and regulations.

All employees may invest in the same securities recommended by Plenty to its clients. Our financial professionals may have personal accounts at our firm that are managed like clients' and may also, with limited exception, have personal accounts held and managed outside of our firm. This could give rise to conflicts of interest if trading by clients is expected to change the value of a security to be purchased or sold by an employee. It could also incentivize employees to favor their personal accounts over clients.' Plenty, as a fiduciary, endeavors to always make decisions in the best interest of its clients if a conflict of interest arises between the Investment Manager's transactions on behalf of its clients and those of Plenty's personnel and related persons. In order to monitor any conflicts of interest, Plenty employees are required to pre-clear certain contemplated transactions in their personal accounts which may present the appearance of impropriety, including investing in securities traded through the Plenty program, and must disclose on an initial and annual basis the holdings of all personal accounts, as well as all transactions on a quarterly basis.

Resolution of Conflicts of Interest. In the case of all conflicts of interest, the Firm's determination as to which factors are relevant, and the resolution of such conflicts, will be made using the Firm's best judgment, but in its sole discretion. The Firm seeks to address these potential conflicts through the use of:

- A robust Code of Ethics (which is described above).
- Annual requirement that Employees complete a questionnaire detailing their other activities and potential conflicts.
- Requirement that Employees pre-clear outside business activities (other than outside activities related to charities, non-profit organizations/clubs, civic/trade organizations).
- Disclosure of potential conflicts of interests and risks in this Form ADV.

Material Non-Public Information and Insider Trading. The Firm has adopted Insider Trading Policies and Procedures designed to mitigate the risks of the Firm and its employees misusing and misappropriating any material non-public information that they may become aware of, either on behalf of the Firm's clients or for their own benefit. The policy applies to every employee of the Firm and extends to activities

both within and outside of their duties to the Firm, including for an employee's personal account.

The Firm may from time to time acquire confidential, material non-public information ("MNPI") about issuers, corporations, or other entities and their securities. The Firm will not use MNPI obtained during making investment decisions for its clients. Additionally, the Firm may not be free to divulge or to act upon such information with respect to its activities and, on occasion, may be restricted from buying or selling certain securities on behalf of clients because of these circumstances. These restrictions may adversely impact the investment performance of client accounts. The Firm has implemented procedures, including those described below relating to information barriers, that prohibit the misuse of such information by the Firm, its employees, and on behalf of its clients. Although the procedures do not provide absolute assurance as to the correct handling of MNPI, these procedures have been reasonably designed to aid the Firm's personnel in avoiding insider trading, and to aid the Firm in preventing, detecting, and imposing sanctions against, insider trading.

### **Review of Accounts**

Plenty conducts ongoing due diligence of the sub-adviser and regularly monitors Client Accounts, maintaining ongoing oversight of these Accounts. In addition, the sub-adviser also monitors Client Accounts they manage on Plenty's behalf, including rebalancing portfolios to maintain the risk tolerance and investment objectives.

### **Voting Client Securities**

Plenty and its subadvisor will not ask for, nor accept voting authority for Client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

### **Client Referrals and Other Compensation**

We do not receive economic benefits from non-Clients for providing investment advice and other advisory services. Neither we, nor any of our related persons, directly or indirectly, compensate any person who is not a supervised person for Client referrals.

- **Promotions:** Plenty Financial RIA, LLC has periodic promotions for technology products, fee waivers on management fees, or reduced management fees. Client referrals, or other referral arrangements as outlined below may, from time to time, be combined with promotional offers. Any combination of benefit and promotional items will not result in a client paying a higher advisory fee. Plenty Financial RIA, LLC will disclose the terms of the promotional offers to clients at the time of the offer.
- **Referrals:** Plenty Financial RIA, LLC may offer free subscription for existing subscribers who refer new Clients. From time to time, Plenty Financial Inc, may also offer other incentives for Client referrals. Plenty Financial Inc will disclose the details of those incentives to existing and referred clients at the time of the offer. Prospective Clients that are referred by existing clients should be aware that the referring client will receive an economic benefit for making the referral. The free advisory Services awarded or any other incentive provided does not increase the fees or costs for the referring or referred client. Referral arrangements create an incentive for third parties and existing clients to recommend Plenty over other similar advisers which may have lower fees.

- **Affiliate Marketing Program:** Plenty Financial RIA, LLC offers an affiliate marketing program for web-based authors and participates in co-registration agreements, where the participants ("affiliate" or "affiliates") are compensated for each person who uses the affiliates' webpages to register with Plenty and create a financial profile. These affiliates are eligible for compensation even if the referred person does not become an advisory Client. As a result of these arrangements, affiliates will financially benefit from referring users to Plenty Financial RIA, LLC. This creates a conflict of interest and incentivizes affiliates to present content favorable to Plenty Financial, Inc. because of the compensation structure of the affiliate marketing program.
- **Other Referral Arrangements:** Plenty Financial RIA, LLC enters into referral agreements with third parties who refer prospective Clients to Plenty ("Referrer" or "Referrers") under which Referrers may receive compensation for each individual who creates a Plenty financial profile. Individuals referred by Referrers may also be given a promotional offer for a waiver on management fees or a waiver on subscription fees for a given time period.
- **Testimonials and Endorsements:** Plenty Financial RIA, LLC enters into agreements with Clients and non-Client Third Parties ("Promoters") to provide testimonials or endorsements of our Advisory Services. Any advertisement that displays a testimonial or endorsement provided by a promoter will disclose clearly and prominently whether the Promoter i) is a Client of Plenty Financial RIA, LLC, ii) is paid or unpaid, and iii) creates any other material conflict of interest. If the promoter is paid, Plenty Financial RIA, LLC confirms that the Promoter is not disqualified under Federal Securities Laws and discloses the compensation.

Individuals who become Clients as a result of our various referral programs acknowledge in our Client agreement that they have reviewed, read, and understood Plenty Financial RIA, LLC's disclosures and Form ADV.

#### **Financial Information**

We do not require or solicit prepayment of more than \$1,200 in fees per Client, six months or more in advance; therefore, we are not required to provide a balance sheet.

We have not been the subject of a bankruptcy petition at any time during the past ten years, and we do not have any financial circumstances that would impair our ability to meet our contractual responsibilities to our Clients.