

R & R FINANCIAL PLANNERS, INC.

FIRM BROCHURE

MARCH 29, 2024

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This brochure provides information about the qualifications and business practices of R & R Financial Planners, Inc. If you have any questions about the contents of this brochure, please contact the Adviser at (516) 222-8850. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities regulatory authority.

R & R Financial Planners, Inc. is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information based upon which you determine to hire or retain an Adviser.

Additional information about R & R Financial Planners, Inc. is available on the SEC's website www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. The CRD number for the Adviser is 113291.

2. MATERIAL CHANGES

Form ADV Part 2 requires registered investment advisers to amend their Brochure when there are material changes to their information or as necessary. If there are any material changes to an adviser's Brochure, the adviser is required to notify you and provide a description of the material changes.

Summary of changes since the submission:

Item 4 Advisory Business

In March of 2024 Ms. Praino became the Chief Compliance Officer of R&R Financial Planners.

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4. ADVISORY BUSINESS

A. OWNERSHIP/ADVISORY HISTORY

R&R Financial Planners, Inc. (“The Adviser”, “We” or “R&R”) began its investment advisory business in June 1986 as a state registered investment advisor. In 2023, the Adviser became registered with the Securities and Exchange Commission (“SEC”). We operate from offices located at 1802 Hempstead Turnpike in East Meadow New York, 11554 and Atlantic Pavilion Offices, 245 N. Ocean Blvd. Suite #302, Deerfield Beach, FL 33441. The Adviser employs two individuals, two of whom serve as investment adviser representatives.

The Principal Officer and Owner of the Adviser is:

William V. Romeo, CFP®

President, Chief Executive Officer (“CEO”)

Effective March 2024, Ms. Nancy Praino was designated as the Firm’s Chief Compliance Officer. Ms. Praino also serves as Chief Compliance Officer of the Firm’s affiliate broker-dealer, RNR Securities. Ms. Praino is a financial industry veteran with over 25 years of experience including Associate Compliance Director at Northeast Securities, Inc., and their investment adviser affiliate Northeast Asset Management.

The Adviser is affiliated with a registered broker-dealer, RNR Securities, LLC (“RNR Securities”). Mr. William V. Romeo is the CEO and President of both the Adviser and RNR Securities. RNR Securities and the Adviser share office space in New York and Florida.

R&R Financial Planners, Inc. offers investment advisory services by either managing client assets or as part of its participation in third party management programs working with clients to find independent advisors to manage the client’s assets. We utilize two platforms so that we can meet the varied needs of our clients.

Fees charged for these services are based on assets under management (“AUM”) and are negotiable. The fees are charged daily, monthly or quarterly in arrears, based on signed advisory agreements (the “Agreement”).

A client may terminate their program without penalty within five (5) business days of signing the Agreement. Either party may terminate the Agreement by providing written notice to the other party specifying the date of termination. The client will incur fees only for the time that their assets are managed. Additional information about investment advisor representatives can be found in Part 2B – Supplemental Brochure that accompanies this brochure.

B. ADVISORY SERVICES OFFERED

The Firm offers two (2) types of managed account platforms:

1) SEI Management Program

The Advisor offers the SEI Asset Management Program (“The Program”) to individual clients. SEI Private Trust Company (“SEI Trust”), a wholly owned subsidiary of SEI Investments, provides custodial and recordkeeping services to Program participants. The Program offers securities and mutual fund management on a discretionary basis, automatic rebalancing and performance reporting for each client account. Client accounts are invested exclusively in various SEI portfolios, which may also include a fund of funds structure.

The Advisor conducts a thorough interview to establish the financial goals and investment objectives of the client. Recommendations are made based on the client’s stated financial condition, risk tolerance, goals and investment objectives. The Advisor obtains a New Account Form from each client documenting their age, address, occupation, dependents, annual income, net worth, tax bracket, investment objectives and prior investment experience, in addition to all other details outlined on the Fact Find and new Account Form.

Upon completion of the interview, the Adviser assists the client in choosing one of available securities and mutual fund asset allocation models. As an alternative to an asset allocation model, the client may choose to purchase individual securities and mutual funds. If the client chooses automatic rebalancing to model allocation and recommended model allocation changes will be available.

The investment managers of the underlying mutual funds are selected by SEI Investment Management Corporation, a subsidiary of SEI Investments. SEI utilizes institutional investment management firms. The portfolio managers are monitored by SEI to ensure that their investment styles and performance remain consistent with the objectives of the securities portfolio and mutual fund holdings. Disclosure documents are provided by SEI of each mutual fund purchased, in addition to the disclosure document provided by the Firm.

Rebalancing maintains the proper allocation to each asset class within the model. Rebalancing occurs automatically when the account holdings deviate from the prescribed quarterly allocation by greater than 2%. For tax-managed models, the variance is 3%.

Rebalancing occurs monthly with no transaction fee. Clients should be aware that redemptions and exchanges between funds may have tax consequences which should be discussed with their independent tax advisor.

SEI Management Program Fees and Account Reporting

Program participants are assessed advisory fees that are negotiable and range from 0.01% - 1.5% annually, charged quarterly, in arrears, as further detailed on the following schedule:

<u>Account Value</u>	<u>SEI Fee</u>	<u>R&R Fee</u>	<u>Total Client Fee</u>
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Under \$1million	0.01% - 1.5%	1.00%	1.01% to 2.5%
\$1 million - \$3 million	0.01% - 1.5%	0.80%	1.01% to 2.3%
Over \$3 million	0.01% - 1.5%	0.60%	1.01% to 2.1%

Client accounts, that are fully funded for the entire quarter, may be linked to reduce the total fee assessed based on the above-referenced schedule.

Advisory fees are assessed and invoiced by SEI and deducted from clients' accounts, in arrears, and paid to R&R Financial Planners, Inc. quarterly. However, accounts funded after the 20th day of the previous month in a quarter will not be charged fees until the end of the following quarter. The initial fee will include the entire quarter plus the days the account was open after the 20th of the last month of the previous quarter.

Each Client will receive quarterly statements from SEI Trust reflecting the account activity, holdings and all fees charged from the previous quarter as fee processing occurs two weeks following the end of the quarter. A quarterly report reflecting market value, cash flows, gains and losses, asset allocation and performance as it relates to market indices is also available should the investor elect its receipt. On an annual basis, the investor will also be provided with a tax report.

2) Interactive Brokers, LLC Program

Interactive Brokers, LLC ("IB") is a NYSE/FINRA/SIPC member firm and the full-service broker dealer through which R&R Financial Planners, Inc. transacts all of its portfolio management trading. R&R Financial Planners, Inc. maintains a Master Group Account within Interactive Brokers, LLC which oversees and has full discretion over all individual client accounts. R&R's investment adviser representatives offer portfolio management for individual client accounts, based on their suitability profile and includes the buying and selling of a wide variety of investments, including but not limited to the following:

Individual common and preferred stocks

Convertible preferred stocks and bonds

U.S. Government. Government Agency, Corporate and Municipal bonds

Sovereign bonds, foreign securities and ADRs

Listed options, including both naked & covered calls and puts

No-load mutual funds and

Exchange Traded Funds

Interactive Brokers, LLC Program Fees and Account Reporting

The Advisor conducts a thorough interview to establish an understanding of each client's trading history, risk tolerance, financial goals and investment objectives. The investment advisor representative or portfolio manager may use the Morningstar Advisor Workstation to build and rebalance ETF or Mutual Fund models that match the client's risk tolerance, time horizon, income needs etc.

As per the agreement signed by all clients during the opening of an IB account, clients attest that all applicable fees will be deducted, in arrears, from their accounts on a daily or monthly basis by Interactive Brokers LLC. Clients will incur fees only for the time their assets are managed. Break point reductions or increases will be adjusted after required balances are maintained for thirty (30) consecutive days. Changes cannot take effect until written request is received and approved by Interactive Brokers, LLC. All fees are negotiated and agreed upon prior to investment.

In some instances, for select clients who have indicated a high risk tolerance, increased knowledge and investment experience are included in the Fact Find questionnaire. The investment adviser representative may purchase small cap highly speculative investments.

In some instances, the investment adviser representative may recommend using RNR Securities (an affiliated broker- dealer) to purchase investments, insurance products or variable products. If securities or insurance products offered by Interactive Brokers or RNR Securities are purchased through a registered representative who is associated with the Advisor, standard commission rate commissions would apply. For more information about conflicts of interest can be found under section 10 of this brochure.

Clients will receive quarterly statements directly from Interactive Broker via US Mail or electronically. In addition, clients have access to daily and monthly statements through Interactive Broker's website.

C. TAILORED STRATEGIES AND SERVICES

R&R offers discretionary investment advice to clients, but clients may impose reasonable restrictions on the management of their accounts i.e., to avoid or include certain asset classes, individual companies or industries. Client restrictions are clearly outlined in the investment advisory agreement with the Firm. R&R provides financial planning services that are tailored to the individual needs of each client based on client meetings which include a review of the client's financial condition including debts suitability profile and investment objectives among other areas of review.

D. WRAP PROGRAM

The Adviser does not sponsor a wrap program. However, the Adviser may offer or recommend a

program through a Third Party Money Manager.

SEI Wrap Program offers Managed Account Solutions has third party money managers for specific investment model strategies which are comprised of SEI funds.

In such cases, the Adviser will not directly manage the account, but will share in a portion of the program fee. The client will receive a copy of the Third Party Money Manager's Form ADV Part 2A with Appendix 1, which will contain detailed information about the program and fees charged.

Interactive Brokers provides a third party management program for select investment advisor representatives and portfolio managers to participate in. The Adviser urges all Third Party Management program clients to read the brochure and ask questions about any aspects of the program that they do not understand.

In addition to receiving brochures and detailed information from SEI or IB, the Firm will also provide clients with a full set of disclosures.

E. CLIENT ASSETS MANAGED

As of 12/31/2023, the client assets held at Interactive Brokers and SEI is approximately \$38,905.000 which are managed on a discretionary basis.

5. FEES AND COMPENSATION

A. The fee schedule for the SEI portfolio management program is as follows:

<u>Account Value</u>	<u>SEI Fee</u>	<u>R&R Fee</u>	<u>Total Client Fee Under</u>
\$1million	0.01% - 1.5%	1.00%	1.01% to 2.5%
\$1 million - \$3 million	0.01% - 1.5%	.80%	1.01% to 2.3%
Over \$3 million	0.01% - 1.5%	.60%	1.01% to 2.1%

B. The fee schedule for the Interactive Brokers portfolio management program is as follows:

<u>Account Value</u>	<u>Annual Fee</u>
Under \$ 25,000.00	3.75%

\$25,000.01 - \$50,000.00	3.50%
\$50,000.01 - \$100,000.00	3.25%
\$100,000.01 - \$250,000.00	3.00%
\$250,000.01 - \$500,000.00	2.75%
\$500,000.01 - \$1,000,000.00	2.50%
Over \$1,000,000.00	2.25%

For all accounts opened after 1/1/2018:

<u>Account Value</u>	<u>Annual Fee</u>
Under - \$100,000.00	2.35%
\$100,000.01 - \$250,000.00	2.00%
\$250,000.01 - \$500,000.00	1.75%
\$500,000.01 - \$1,000,000.00	1.50%
Over \$1,000,000.00	1.00%

- C.** Fees are deducted, in arrears, by the Broker Dealers, Custodians and sponsors.
- D.** Mutual funds in which Client assets are invested may assess charges in addition to the advisory fee, such as 12b-1 fees and administrative fees. SEI Trust account service fees, currently \$200 per year, are also charged quarterly in arrears. Accounts valued in excess of \$250,000 are not subject to this fee. Clients may also incur redemption fees from mutual funds that were redeemed in order to participate in The Program.
- E.** Clients may incur certain charges imposed by custodians, brokers and other third parties such as custodial fees, trade-execution fees (“ticket charges”), short-term redemption charges, odd-lot differentials, transfer taxes, wire and electronic fund transfer fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange-traded funds also charged internal management fees, which are disclosed in a fund’s prospectus which is received at the time of investment. Such charges, fees and commissions are exclusive of and in addition to R&R Financial Planners, fee, and R&R Financial Planners, does not receive any portion of these commissions, fees, and costs.

The adviser may reduce or waive its fees in certain circumstances i.e., when doing pro-bono work or managing investments for charitable organizations, etc. Discounts may also

be granted to certain employer, fraternal, charitable, and religious or other groups, as well as certain professionals and/or their clients.

The Adviser's fees are negotiable.

F. Clients are not required or requested to pay fees in advance.

G. Supervised persons are permitted to accept compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds and insurance products

1. Supervised persons are not permitted to provide services that are not in the client's best interests. Clients are provided disclosures about any conflicts of interests that exist.
2. Our compensation from the advised accounts is not transaction or commission based.
3. The Firm does not charge mark ups or any other charges in addition to advisory fees.

6. Performance fees

Performance fees including side by side management fees are not charged by the Firm. The Firm does not charge performance based fees, nor engage in any side-by-side management.

7. Types of Clients

R&R Financial Planners, Inc. does not target any specific market. Each client relationship is approached from the standpoint that they are unique and possess their own suitability profile, financial condition, investment objective, life experience and risk tolerance. The investment advisor representative will meet with and discuss any individual or business concerning their investments or retirement plan.

Our current clients come from the following sectors: Individuals, Deferred Contribution and Individual Retirement Plan participants, High Net Worth Individuals, non-public corporations (LLC's) and Trusts.

Each clients' financial needs and investment objectives disclosed on the initial fact find, the New Account Form and Investment Advisory Agreement, drive the decision on the advisory services that are recommended to the client.

8. Methods of Analysis, Investment Strategies and Risk of Loss

A. Securities and investment products are analyzed based on available research, company performance reports and economic / industry trends. Clients are informed that certain securities investments may involve the risk of loss that they should be prepared to bear. R&R Financial Planners, Inc.'s Investment Advisor Representatives and Third Party Money Managers collect data and information from various sources to evaluate the available product returns and risk of loss. These sources, include but are not limited to:

Media (Newspapers, Magazines, and Internet Sites and Searches)

Research reports that are prepared by independent / industry professionals

Annual Reports, Press Releases, SEC Filings and Corporate Rating Services

Prospectuses and Offering Memoranda

B. As with any investment, there is no guarantee that your portfolio will achieve its investment objective. You could lose money by investing in our services, and you alone will bear such losses. The value of your investment in any service may be affected by one or more of the following risks, any of which could cause the portfolio's return, the price of the portfolio's shares or the portfolio's yield to fluctuate:

Market Risk: Even a long-term investment approach cannot guarantee a profit. Economic, political, and issuer-specific events will cause the value of securities to rise or fall. Because the value of investment portfolios will fluctuate, there is the risk that you will lose money and your investment may be worth more or less upon liquidation.

Foreign Securities and Currency Risk: Investments in international and emerging-market securities include exposure to risks such as currency fluctuations, foreign taxes and regulations, and the potential for illiquid markets and political instability.

Capitalization Risk: Small-cap and mid-cap companies may be hindered as a result of limited resources or less diverse products or services. Their stocks have historically been more volatile than the stocks of larger, more established companies.

Interest Rate Risk: In a rising rate environment, the value of fixed-income securities generally declines, and the value of equity securities may be adversely affected. Prices of bonds tend to move inversely with changes in interest rates. Typically, a rise in rates will adversely affect bond prices.

Credit Risk: Credit risk is the risk that the issuer of a security may be unable to make interest payments and/or repay principal when due. A downgrade to an issuer's credit rating or a perceived change in an issuer's financial strength may affect a security's value and thus, impact the performance. Failure of an issuer or guarantor of a fixed income

security, or the counterparty to a derivative transaction, to make timely interest or principal payments or otherwise honor its obligations, could cause a portfolio to lose money. Similarly, a decline or perception of a decline in the credit quality of a bond can cause the bond's price to fall.

Securities Lending Risk: Securities lending involves the risk that the fund loses money because the borrower fails to return the securities in a timely manner or at all. The fund could also lose money if the value of the collateral provided for loaned securities, or the value of the investments made with the cash collateral, falls. These events could also trigger adverse tax consequences for the fund.

Small-Capitalization Company Risk: The securities of small-capitalization companies may be subject to more abrupt or erratic market movements and may have lower trading volumes or more erratic trading than securities of larger companies or the market averages in general. The earnings and prospects of these companies are generally more volatile than larger companies. Small-capitalization companies may experience higher failure rates than do larger companies. Stocks of such companies involve higher risks in some respects than do investments in stocks of larger companies.

Exchange Traded Funds Risk: ETFs face market-trading risks, including the potential lack of an active market for shares, losses from trading in the secondary markets, and disruption in the creation/redemption process of the ETF. Any of these factors may lead to the fund's shares trading at either a premium or a discount to its "net asset value."

Equity Securities Risk: Equity securities represent an ownership position in a company. Equity securities typically consist of common stocks. The prices of equity securities fluctuate based on, among other things, events specific to their issuers and market, economic and other conditions. For example, prices of these securities can be affected by financial contracts held by the issuer or third parties (such as derivatives) relating to the security or other assets or indices. There may be little trading in the secondary market for particular equity securities, which may adversely affect our firm's ability to value accurately or dispose of such equity securities. Adverse publicity and investor perceptions, whether or not based on fundamental analysis, may decrease the value and/or liquidity of equity securities. Investing in smaller companies may pose additional risks as it is often more difficult to value or dispose of small company stocks, more difficult to obtain information about smaller companies, and the prices of their stocks may be more volatile than stocks of larger, more established companies. Clients should have a long-term perspective and, for example, be able to tolerate potentially sharp declines in value.

Options Risk: Certain types of option trading are permitted in order to generate income or hedge a security held in the program account, namely, the selling (writing) of covered call

options or the purchasing of put options on a security held in the program account. Clients should be aware that the use of options involves additional risks. The risks of covered call writing include the potential for the market to sharply rise. In such case, the security may be called away and the program account will no longer hold the security. The risk of buying long puts is limited to the loss of the premium paid for the purchase of the put if the option is not exercised or otherwise sold by the program.

Fixed Income Securities Risk: Fixed income securities are subject to the risk that securities could lose value because of interest rate changes. Fixed income securities with longer maturities are subject to greater price shifts as a result of interest rate changes than fixed income securities with shorter maturities. Fixed income securities are generally subject to credit risk (see paragraph directly below), which is the risk that an issuer will not make timely payments of principal and interest. Limited trading opportunities for certain fixed income securities may make it more difficult to sell or buy a security at a favorable price or time.

High Yield Risk: High yield bonds involve greater risks of default or downgrade and are more volatile than investment-grade securities. High yield bonds involve a greater risk of price declines than investment-grade securities due to actual or perceived changes in an issuer's creditworthiness. In addition, issuers of high yield bonds may be more susceptible than other issuers to economic downturns, which may result in a weakened capacity of the issuer to make principal or interest payments.

Lack of Liquidity: The Adviser monitors the liquidity of client assets in making decisions regarding the client investments. However, certain investments, including derivatives, may have to be held for a substantial period of time before they can be liquidated to the portfolio's greatest advantage or, in some cases, at all. Portfolios may also hold securities for which a market exists, but which generally have a relatively low trading volume. Portfolios may not be able to dispose of such securities at the most favorable price or time if there is limited demand when the Adviser wishes to sell them.

Performance of Underlying Managers: We select the mutual funds and ETFs in the asset allocation models. However, we depend on the manager of such funds to select individual investments in accordance with their stated investment strategy.

Management and Strategy Risk: The ability of a portfolio to meet its investment objective is directly related to the Adviser's investment strategies for portfolios, and multi-strategy approach. The investment process used by GPS or Managers could fail to achieve client investment objective and cause investments to lose value.

Market Sector Risk: The Advisers investment strategy may result in significantly over or under exposure to certain industries or market sectors, which may cause a portfolio's

performance to be more or less sensitive to developments affecting those industries or sectors.

Non-Diversification/Concentration: The Adviser may invest client accounts primarily in the equity securities of a small number of issuers. Accordingly, a client's portfolio may be subject to more rapid change in value than would be the case if the Adviser elected not to concentrate on certain issuers or maintained a wider diversification among industries, geographic areas, types of securities and issuers.

We may selectively conduct frequent trading of securities. In those instances, clients are made aware of increased brokerage and other transaction fees and taxes, which reduce their rate of return. Depending on the customer's portfolio, not all areas of risk may be applicable and limited to the products in the client's portfolio.

R&R Financial Planners, Inc.'s Investment Advisor Representatives and Portfolio Managers will use the following types of analysis when reviewing investment opportunities. They may include:

Fundamental Analysis, Technical Analysis, Charting, and Business Cycle Analysis. Each client is approached from the standpoint that they are unique with personalized investment objectives, experiences and risk tolerances. Discussing these topics and gaining an understanding of the client will provide the investment advisor representative with the information needed to recommend an appropriate platform or program.

Based on the client's answers to the questionnaire concerning risk and investment timeframe the Investment Advisor Representative or Portfolio Manager may recommend the use the following strategies:

Long term Investments (longer than one year) Short term Investments (less than one year) Trading (less than 30 days)

Margin or the use of debt to attain investment goals

Short Sales – When appropriate the use of short sales may be an applicable strategy

The investment universe is quite broad. The investment products or vehicles available are:

<u>Equity Type Products</u>	<u>Debt-related Products</u>
Common Stock (Domestic & Foreign)	Corporate bonds

Preferred Stock (Domestic and Foreign) (Convertible and Participating)	U.S. Government and Government Agency bonds
Listed Real Estate Investment Trusts	Taxable and Non-Taxable Municipal bonds
Mutual Funds	Foreign Corporate or Sovereign Debt
Exchange Traded Funds	Convertible bonds
Warrants, Rights and Listed Options	Collateralized Mortgage Obligations and other Asset-backed Securities

Our portfolio management investment programs offer the following customizable strategies:

Growth: This strategy seeks to maximize portfolio appreciation within the risk parameters of the client, with no consideration given, or even some avoidance, of current income. This strategy is most suitable for aggressive investors who want to maximize the value of their accounts, are risk tolerant and wish to emphasize long term appreciation that will be taxed at more favorable capital gains rates.

Growth with Income: This strategy gives primary emphasis to capital appreciation, but without sacrificing income entirely. Serious consideration is given to current income as an investment objective in the portfolio mix. This strategy is most suitable for investors who want their accounts to grow, but prefer a less aggressive portfolio than described above. And it offers a blended strategy of capital appreciation and current income.

Income with Growth: This strategy emphasizes current income as its primary objective, but also seeks to provide some appreciation so that the value of the account is maintained relative to inflation. This strategy is most suitable for retirees living off the income produced by their portfolios, tax sheltered accounts that allow asset value buildup from income without taxing that income along the way, and more risk adverse investors.

Balanced: This strategy balances an allocation of equities with a target allocation of fixed income products. The equity to fixed income ratio can change with market conditions. The fixed income assets may be taxable or tax exempt depending on the tax status of the account. The equity allocation is an all cap diverse mix of common stocks and other securities.

Conservative: This strategy's emphasis is capital preservation and will use bonds for the goal of income or diversification from equity portfolios. The portfolio may be taxable or tax exempt depending on the client's tax status. The managers will use either treasuries, corporate or municipal bonds, as well as, bond derivatives to reduce risk.

- C. We do not primarily recommend any particular type of security or asset class. Clients may request the inclusion or exclusion of any securities products or investment strategy.

9. Disciplinary Information

Yes, we welcome you to visit www.investor.gov/CRS for a free and simple search tool to research our firm and financial professionals.

10. Other Financial Industry Activity and Affiliations

- A. Mr. Romeo is the majority owner, Chief Executive Officer and a registered representative of RNR Securities, LLC, ("RNR") an affiliate broker-dealer, FINRA/SIPC member firm.

Mr. Rosa our portfolio manager is also a Registered Representative of ("RNR").

- B. No management persons nor any Investment Advisor Representatives are registered or pending to register in commodities or futures trading asset classes.
- C. RNR Securities is a general agency for Med America, John Hancock, Genworth, MetLife, MassMutual, Security Mutual, and First UNUM Life Insurance Companies, as well as Safe Path Benefits and their affiliates such as Empire and AARP that can be used to secure these insurance products. R&R Investment Advisor Representatives are appointed insurance agents for these and other insurance companies. Certain insurance products may only be sold by registered representatives through a broker-dealer. For purchases of those products, customers will be required to establish an account at RNR Securities where all related fees and commissions will be applied.
- D. The Adviser may recommend the services of a Third-Party Money Manager. This service and its fees are fully described in Items 4.and 5 above.

11. CODE OF ETHICS

- A. A. The Adviser's Code of Ethics charges all supervisory personnel, associated persons and employees with ensuring that the Adviser conducts its business with the highest level of ethical standards and in keeping with its fiduciary duty to clients; specifically, to exercise its authority and responsibility for the benefit of clients, to act in the client's best

interests. Additionally, the Adviser's Code of Ethics addresses such issues as privacy of client information, prohibited acts, conflicts of interest, suitability of recommendations, and charges the Adviser's Chief Compliance Officer with the responsibility of ensuring adequate supervision over the activities of all persons who act on the Adviser's behalf.

The Adviser will furnish a copy of its Code of Ethics free of charge to clients or prospective clients upon request. The Code of Ethics ("The Code") is a compilation of basic principles of conduct for which all firm employee, are responsible for knowing and following. These principles represent values critical to our customers and others to conduct our business with honesty and integrity. The Code has been adopted to protect the reputation and integrity of R&R Financial Planners, Inc. and its employees and to assist employees in following uniform standards of ethical conduct. The term "employee" in the Code is understood to mean officers, directors, employees, and independent contractors.

The Code of Ethics is intended to govern the actions and working relationships of employees with current or potential customers, consumers, other Firm employees, competitors, suppliers, government representatives, the media, and anyone else with whom the Firm has contact. In these relationships, employees must observe the highest standards of ethical conduct. The success of R&R Financial Planners, Inc. as a provider of financial services is built upon the trust and confidential relationships maintained between R&R Financial Planners, Inc. and its customers. Therefore, each employee is expected in all business matters to act in the customers' best interest,

Employees must resolve any doubt as to the meaning of the Code in favor of good, ethical judgment.

It is the responsibility of each employee to avoid even an appearance of impropriety.

Implicit in the Code of Ethics is R&R Financial Planners, Inc. policy that both R&R Financial Planners, Inc. and its employees comply with the law. The law prescribes a minimum standard of conduct; the Code of Ethics prescribes conduct that often exceeds the legal standard. Any request made of an employee by any supervisor carries with it, whether or not articulated, the understanding that the employee is to comply with the request only to the extent he or she can do so while complying both with the law and this Code of Ethics. In certain instances, areas of R&R Financial Planners, Inc. have their own unique policies governing subjects covered by the Code of Ethics due to their lines of business. These policies are in addition to the requirements of the Code of Ethics.

Non-public information regarding R&R Financial Planners, Inc. or its businesses, employees, customers, suppliers or consumers is confidential. Employees may not purposefully access or view such information without a business justification, disclose such information, or use it for trading in securities or for other personal gain during or after

employment, except that employees may use confidential information to perform their job duties.

Employees are prohibited from:

1. Accepting employment or engaging R&R Financial Planners, Inc. in a business (including consulting and similar arrangements or arrangements with competitors) that may conflict with the performance of their duties or R&R Financial Planners, Inc. interest. All outside business activities require prior approval by Compliance.
2. Taking for themselves personally opportunities that are discovered through the use of R&R Financial Planners, Inc. proprietary, non-public information (such as processes, programs, software, and business information and plans) about R&R Financial Planners, Inc. or its businesses, or position, even if developed by the employee either within or outside of the employee's area of responsibility, or using corporate property, information or position for personal gain, or competing with R&R Financial Planners, Inc.
3. Taking unfair advantage of any customer, supplier, competitor, or other Firm information through manipulation, concealment, abuse of privileged information, misrepresentation of material fact, or any other unfair dealing or practice.
4. Soliciting or demanding anything of value from any person in conjunction with the performance of their duties to R&R Financial Planners, Inc. (other than normal compensation received from R&R Financial Planners, Inc.).
5. Accepting personal fees, commissions, other compensation paid, or expenses paid or reimbursed from others, not in the usual course of R&R Financial Planners, Inc.'s business, in connection with any business or transaction involving R&R Financial Planners, Inc.
6. Purposefully viewing or using confidential information about the Firm or its businesses, employees, or customers, consumers or suppliers without a valid business reason, for personal benefit or disclosing such information to others outside of job duties.
7. Misusing R&R Financial Planners, Inc.'s information technology and electronic communications system, including accessing or distributing pornographic or other distasteful information or materials containing offensive, sexually explicit or harassing language, sending chain letters, or conducting excessive personal business.
8. Permitting Firm property (including data transmitted or stored electronically and computer resources) to be damaged, lost, used, or intercepted in an unauthorized manner.

9. Making any political contribution of money or other property on behalf of R&R Financial Planners, Inc. that would violate federal or state law.
10. Borrowing or accepting money from customers or suppliers unless the customer or supplier is a financial institution that makes such loans in the ordinary course of its business.
11. Purchasing property, whether real, personal or intangible, from R&R Financial Planners, Inc. without the approval of his or her supervisor or other designated senior officer unless R&R Financial Planners, Inc. makes a general offer of extraneous company property to employees on a non-discriminatory basis.
12. Selling property or services to R&R Financial Planners, Inc. unless approved by Compliance which will ascertain the reasonableness of the selling price.
13. Providing customers with legal, tax, accounting or investment advice not in the usual course of business; or recommending attorneys, accountants, securities dealers, insurance agents, brokers, real estate agents, or other service providers if the advising employee receives a personal reciprocal benefit for the referral from the service provider. (Note that referrals to service providers are permissible as long as the employee does not receive a personal reciprocal benefit for that referral.)
14. Engaging or investing in any business that directly or indirectly competes with services provided by R&R Financial Planners, Inc. or any subsidiary of the Firm, except where such an investment represents insignificant ownership in a publicly traded company.
15. Knowingly benefiting from an error, including but not limited to payment of compensation (including incentive plan payments) or travel and entertainment expense reimbursement, without disclosing that error.
16. Doing any of the above actions indirectly through another person.

Gifts and Entertainment

In a commercial setting, the purpose of business entertainment and gifts is to promote goodwill and sound working relationships, not to gain unfair advantage. No gift or entertainment should ever be offered, given, provided or accepted by any employee in connection with R&R Financial Planners, Inc. business unless it is approved by Compliance and, 1) is not a cash gift, 2) is consistent with customary business practices, 3) is not excessive in value, 4) is not construed as a bribe, payoff or kickback and 5) is not in violation of any laws, rules, statutes or regulations.

Bequests

An employee must report to Compliance any potential bequest in excess of US\$100 to the employee under the will or trust instrument of a customer, vendor or supplier of R&R Financial Planners, Inc., whether or not R&R Financial Planners, Inc. is the fiduciary named under such instrument, unless the customer, vendor, or supplier is a member of the employee's immediate family. Bequests in excess of US\$100 are subject to the approval of the employee's immediate supervisor and Compliance.

Privacy

Employees are restricted from accessing, sharing or using certain information across Firm affiliates and from sharing information with external third parties, except as allowed by law. Employees must not view or request access to information unless a valid business purpose exists.

Holding Elected Office or Political Appointments

1. Before an employee may become a director, officer, or partner of any business organized for profit outside R&R Financial Planners, Inc., written approval by Compliance is required.
2. Employees are encouraged to participate in organizations that are involved in charitable, educational, or community activities, and no approval is needed for involvement with such organizations unless the employee will receive compensation.
3. Employees are encouraged to participate in civic and political activities.
4. An employee may hold a part-time elective or appointive office provided the employee receives the prior written approval of Compliance and provides full disclosure concerning the time involved and compensation, if any, to be received. When an employee seeks a political office, the employee must obtain an opinion from the political entity's legal counsel stating that the employee's candidacy is not prohibited and that the employee's election or appointment will not bar the political entity from doing business with R&R Financial Planners, Inc.
5. Employees must avoid appointments, including fiduciary appointments, which may conflict with the performance of their duties for R&R Financial Planners, Inc. or otherwise interfere with their employment relationship with the Firm. All fiduciary appointments, except those on behalf of the employee's immediate family members ("Immediate family member" means a person's child, parent, spouse, sibling, and in-laws) must be approved by Compliance which may require execution of a hold harmless agreement by the beneficiary.

Employees are prohibited from maintaining trusteeships and other fiduciary appointments for their own customers other than immediate family members.

Internal Accounting Controls

It is the legal responsibility of R&R Financial Planners, Inc. to develop and maintain systems of internal accounting controls to ensure that the preparation of its financial statements are in accordance with applicable laws, rules, and generally accepted accounting standards and principles.

No one shall, directly or indirectly, knowingly falsify or cause to be falsified any book, record or account of the Firm. This includes expense accounts, approval of invoices submitted by vendors, records of transactions with customers, reports of the disposition of company assets, records of consumers, or any other records.

Any employee who becomes aware, directly or indirectly, of inadequate controls, a failure of controls, or a circumvention of controls, or that transactions or other items are improperly recorded on R&R Financial Planners, Inc.'s books or records, must promptly report the situation to Compliance.

Reporting Possible Ethics Violations and Disciplinary Action

Employees have an obligation to report potential ethics violations to Compliance. Compliance will maintain the confidentiality of the individual reporting the possible violation; the employee may also report anonymously the identity of the parties involved. Retaliation against employees who report possible violations is strictly prohibited and will subject those who retaliate with disciplinary action which may include termination. Those who violate the Code are subject to disciplinary action which may include termination.

For example, if an employee would feel more comfortable in merely reporting that they suspect several of their coworkers or portfolio managers are involved in what appears to be falsifying documents or that a fellow employee is involved in a transaction that may be a conflict of interest on his or her part, the employee need only report the suspected Code violation, the persons involved, and the department in which they suspect the activity is occurring.

B. Trading in the Stock of the Firm's Customers, Suppliers or Vendors Securities

No employee may invest in the securities of the Firm's customers, if the employee participates in or has plans to participate in transactions involving, or is responsible for, extensions of credit to the customer or if the customer's securities are publicly traded and the employee has material non-public information concerning the customer at the time of

the proposed investment. If the employee participates in or is responsible for decisions involving non-credit business transactions with the customer, the employee must comply with any investment policy applicable to the employee's line of business before making an investment in the customer's securities. In no case may the employee invest in the customer's securities until after making disclosure of the proposed investment to the employee's immediate supervisor, to the person approving the transaction with the customer, and Compliance.

Supplier or Vendor Securities

No employee may invest in the securities of a supplier or vendor if the employee participates or is expected to participate in or is responsible for decisions involving business transactions with the supplier or vendor or if the securities are publicly traded and the employee has nonpublic information about the supplier or vendor at the time of the proposed investment. If an employee has an existing investment in the securities of a supplier or vendor of R&R Financial Planners, Inc. and such employee participates or is expected to participate in or is responsible for decisions involving business transactions with the vendor or supplier, the employee shall promptly disclose the investment to his or her immediate supervisor and Compliance, and shall refrain from further participation in such decisions unless expressly authorized in writing by his or her immediate supervisor and Compliance.

An employee may make an insubstantial investment in the publicly traded securities of a supplier or vendor even though such employee participates or is expected to participate in or is responsible for decisions involving the supplier or vendor if the employee obtains the prior approval of the employee's immediate supervisor and Compliance.

Full and Fair Disclosure

Employees are required to make full, fair, accurate, timely, and understandable disclosure in reports and documents that R&R Financial Planners, Inc. files with, or submits to, the Securities and Exchange Commission, State Securities Regulators, SROs, government agencies, and in other public communications made by R&R Financial Planners, Inc.

Compliance

1 Each employee of R&R Financial Planners, Inc. shall act on R&R Financial Planners, Inc.'s behalf in a manner that complies with all laws, rules, and regulations under which R&R Financial Planners, Inc. must adhere to. Any employee who becomes aware, either directly or indirectly, of an employee's violation of a law involving a breach of trust must report the violation promptly to Compliance.

2. If an employee becomes aware of or suspects embezzlement, false entries in R&R Financial Planners, Inc.'s records, false statements to R&R Financial Planners, Inc.'s regulators, false statements by customers or consumers (where the employee knows that the statement is false or has reason to inquire as to its falseness), or any fraud or potential fraud, or other criminal violation involving R&R Financial Planners, Inc. its employees or customers, such employee must immediately contact Compliance.
3. An employee who is convicted of a crime (other than a minor traffic offense) or found liable for an offense that subjects the employee to a disciplinary or licensure order by a regulatory agency or self-regulatory organization, must promptly report the event to Compliance. In addition, an employee who is arrested and charged with (but not convicted) of a crime involving a breach of trust, dishonesty, substance abuse, money laundering, or a felony, or is charged with (but not found liable) of an offense by a regulatory agency or self-regulatory organization that may result in a disciplinary or licensure restriction order must promptly report the event to Compliance. Failure to report the above is a violation of the Code and subject's the associated person with disciplinary action, up to and including termination.
4. Employees must fully cooperate with any request by R&R Financial Planners, Inc., if and when, it needs to conduct an investigation of any employee. Failure to do so constitutes violation of the Code.

Supervision

It is the responsibility of each supervisor to train and supervise employees so that they are able to perform their jobs in a competent manner and in conformity with R&R Financial Planners, Inc.'s policies, including the Code of Ethics. When assigning responsibilities to an employee, it is the supervisor's responsibility to ensure that the employee has demonstrated the capability to discharge the assigned responsibility in conformity with the Code of Ethics. It is also the supervisor's responsibility to ensure that all employee questions concerning the operation and requirements of the Code of Ethics are fully addressed.

Administration

1. The Chief Compliance Officer is responsible for the administration of the Code of Ethics and updating the Code when necessary.
2. All employees will receive a printed copy or directed to review an electronic version of the Code upon hire and will certify their compliance annually.

3. Disclosures, approvals, or waivers will be reviewed, acted upon, and retained by the Chief Compliance Officer with the exception of requests for waivers by Firm directors which will be reviewed and acted upon by the Board of Directors and/or R&R Financial Planners, Inc. Audit Committee, if an audit committee exists.

4. The Code of Ethics and other recent or topical matters will be included in periodic employee training.

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

Personal securities transactions by an employee of an investment adviser may raise a potential conflict of interest when that employee owns or trades in a security that is owned or considered for purchase or sale by a client, or recommended for purchase or sale by an employee to a client. The Firm's Code of Ethics includes rules that are designed to detect and prevent conflicts of interest when investment professionals and other employees own, buy or sell securities which may be owned by, or bought or sold for clients. If transactions are executed on the same day, the client will receive the better price.

12. Brokerage practices

Client accounts being managed on the Interactive Brokers platform are required to use Interactive Brokers as custodian and will have their transactions placed by Investment Advisor Representatives and portfolio managers approved by Interactive Brokers. Not all Investment Advisor Representatives require clients to direct their brokerage transactions to IB. This practice is selected to result in receiving the most favorable execution and but may cost you more per share. R&R Financial Planner, Inc. does not receive any compensation from Interactive Brokers or other vendors regardless of where trades are executed.

Matters involving conflict of interest are not always evident and employees should consult with the Compliance where even a remote possibility of conflict might exist. Full disclosure and mitigation of any conflict of interest that arises in conducting business is required by R&R Financial Planner, Inc.'s employees.

A. RESEARCH AND SOFT DOLLARS

"Soft dollars" are defined as a form of payment investment firms can use to pay for goods and services such as news subscriptions or research. Access to free or discounted research has not been received based on the volume of the Adviser's transactions but rather made available equally to all investment advisor representatives using the broker's clearing and custodial services. Should Adviser enter into a "soft dollar" arrangement, it shall be only to the extent that they comply with

the “safe harbor” requirements of Section 28(e) of the Securities Exchange Act of 1934 and any then-current federal and state regulations.

The Adviser does not receive any soft dollar benefits from Interactive Brokers or any of its Third Party Money Managers. The benefits provided by Interactive Brokers, LLC include assistance with practice management and the management of client accounts, including but not limited to: (a) receipt of duplicate client confirmations; (b) receipt of duplicate client statements; (c) access to a trading desk serving Registered Investment Adviser firms exclusively, and providing research, pricing information, and other market data; (d) access to the investment advisory portion of their web sites which includes practice management articles, compliance updates, and other financial planning related information and research materials (including, for example, access to ratings and research reports on individual companies); (e) access to other vendors (such as insurance or compliance providers, or providers of research or other materials) on a discounted basis; (f) permitting the Adviser to access an electronic communication network for client account information and order entry, which may otherwise assist the Adviser with its back-office functions, including recordkeeping and client reporting; and (g) conferences that the Adviser’s personnel may attend, often gratis, and receive education on issues such as practice management, marketing, investment theory, financial planning, business succession, regulatory compliance, and information technology. Participation in Interactive Brokers, LLC’s programs also provides access to certain mutual funds which generally require significantly higher minimum initial investments or are generally available only to institutional investors. The benefits received through participation in the custodian’s programs may depend upon the amount of assets under management or amount of assets placed in custody with, Interactive Brokers, LLC. Generally, many of these services may be utilized to service all or a substantial number of clients’ accounts. Educational, research, or other services provided by custodian or mutual fund companies may benefit all of Adviser’s clients, or only some. The receipt of these benefits may create a conflict of interest.

R&R believes that Interactive Brokers acts in the best interest of its clients for the services rendered, commissions and other fees charged.

B. BROKERAGE FOR CLIENT REFERRALS

The Adviser has not entered into any arrangements with either Interactive Brokers, LLC or any other Broker-Dealer to provide brokerage business in exchange for client referrals.

C. DIRECTED BROKERAGE

The firm does not engage in directed brokerage activities.

When R&R recommends a third party money manager for its clients, a copy of that manager’s Form ADV part 2 will be delivered for approval prior to the initiation of any portfolio management services.

13. Review of accounts

The investment advisor representative will periodically review their clients account(s). Such reviews will be conducted on a schedule suitable to the client. These reviews may also be conducted or supplemented through on-going communications with client. The performance of these reviews and/or notes of conversations must be documented. Each client account will be reviewed on a periodic basis by the compliance officer. Additional interim reviews may be conducted when an investment advisor representative leaves R&R Financial Planners, Inc. or when the investment advisor representative becomes the subject of a complaint involving investment-advisory -related activities or any unethical behavior. These additional reviews will be documented. Account reviews are based on numerous factors, however, all accounts are monitored weekly, clients receive account statements quarterly for discussion with the Adviser and clients will have an annual portfolio review meeting to seek to ensure that investment objectives and financial goals are being met. Statements are obtained from SEI, IB and customer asset information.

14. Client Referral and Other Compensation

R&R Financial Planners, Inc. may recommend certain third party managers to manage client's assets as part of the SEI Investments or Interactive Brokers, LLC platforms discussed above. R&R Financial Planner, Inc. does not receive any special or added compensation from any third-party money managers or custodians, other than that disclosed in Item 5 above, for the referral or recommendation.

15. Custody

R&R Financial Planners, Inc. does not take physical custody of client's securities or funds. Any funds or securities received from a client are sent promptly to the appropriate custodian. These custodians will provide statements at least quarterly and on a calendar year basis. Custodians provide memos and advices for the deduction of investment advisory fees that are detailed in Item 5 above. There may also be supplemental or special reports generated by the custodian.

16. Investment Discretion

Investment advisor representatives and portfolio managers have full discretionary authority to trade client's accounts at Interactive Brokers, LLC. For SEI, investment advisors have limited discretionary authority, which is only for charging advisory fees. The investment advisor representative may recommend that the client use a Third Party Money Manager to whom the client will give discretionary authority. Once a client has chosen a third party money manager, the investment advisor representative does not have discretionary or any other authority over the

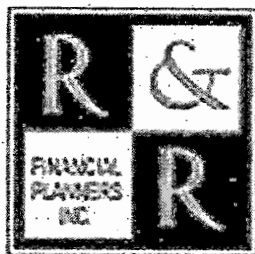
client's account. Changes of Third Party Money Managers and the granting of discretionary authority can only be made with the advice and consent of the client.

17. Voting Client Securities

R&R Financial Planners, Inc., Inc. will not assume proxy voting authority for clients. Proxy voting is the sole responsibility of each client.

18. Financial Information

R&R Financial Planners, Inc. does not require and does not solicit pre-payment of fees from clients greater than \$1,200 or six months or more in advance. In addition, there are no foreseeable financial events or conditions that are likely to impair R&R Financial Planners, Inc's ability to meet all contractual commitments to clients.



*"We Make Dollars
With Sense"*

R&R Financial Planners, Inc.
Supervised Person
Supplement to Firm Brochure

Mr. William V. Romeo

1802 Hempstead Turnpike
East Meadow, NY 11554

Telephone (516) 222-8850

245 N. Ocean Blvd., Ste #302
Deerfield Beach, FL 33441

www.randrfinancialplanners.com

This brochure supplement provides information about Mr. William V. Romeo that supplements the R&R Financial Planners, Inc. brochure. You should have received a copy of that brochure. Please contact Nancy Praino if you did not receive R&R Financial Planners, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about R&R Financial Planners, Inc. is available on the SEC's website at
www.adviserinfo.sec.gov

Educational and Business Background

Mr. Romeo was born in 1956 and graduated from the University of Hawaii in 1978 where he earned his Bachelor of Secondary Education. In June 1984 Mr. Romeo completed his Certified Financial Planner educational program at Adelphi University, Garden City, New York.

Mr. Romeo has been CEO of R&R Financial Planners, Inc. since its inception in 1983, and in June 2007 he became President and sole owner. Since 1997, he founded and has held the position of CEO of RNR Securities, L.L.C., a registered broker dealer. As of October 2008, Mr. Romeo became the sole owner of RNR Securities, L.L.C. In addition to being qualified as a Certified Financial Planner®. Mr. Romeo holds the following FINRA Series Licenses 7, 22, 24, 51, 63 and 99, as well as New York State Department of Financial Services' Life, Accident and Health insurance and Variable products licenses.

DISCIPLINARY INFORMATION

Mr. Romeo has no criminal or civil actions against him in either a domestic, foreign or military court to report.

OTHER BUSINESS ACTIVITIES

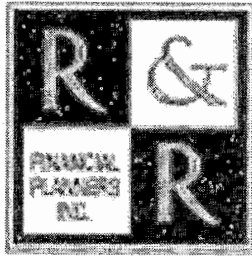
Mr. Romeo is a member and 50% owner of 1802 Hempstead Tpke, LLC; located at 1802 Hempstead Turnpike, East Meadow, NY 11554. Non-investment related purchase land or property started October 2008, spends 8 hours quarterly.

ADDITIONAL COMPENSATION

Mr. Romeo does not provide advisory services to individuals that are not clients of R&R Financial Planners, Inc. and therefore does not receive additional compensation for providing such advisory services.

SUPERVISION

Nancy Praino is the Chief Compliance Officer responsible for the supervision of Mr. Romeo. Mr. Romeo can be reached at (516) 222-8850. Mr. Romeo performs periodic reviews of client accounts as well as actively communicates with clients to be sure they are receiving proper guidance.



*"We Make Dollars
With Sense"*

R&R Financial Planners, Inc.
Supervised Person
Supplement to Firm Brochure

Mr. Anthony Rosa

1802 Hempstead Turnpike
East Meadow, NY 11554

Telephone (516) 222-8850

www.randrfinancialplanners.com

This brochure supplement provides information about Mr. Anthony Rosa that supplements the R&R Financial Planners, Inc. brochure. You should have received a copy of that brochure. Please contact Mr. Bill Romeo if you did not receive R&R Financial Planners, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about R&R Financial Planners, Inc. is available on the SEC's website at
www.adviserinfo.sec.gov

EDUCATION AND BUSINESS BACKGROUND

Mr. Rosa was born in 1956 and graduated from SUNY Old Westbury with a degree in Elementary Education in 2000 and received his Masters degree at Long Island University at C.W. Post in Special Education in 2001. Mr. Rosa holds permanent certification and licenses for elementary, special education, and secondary school teaching.

Mr. Rosa is a Registered Options Principal and has over 25 years experience in equity portfolio management that includes the management of stocks, bonds, mutual funds, options and exchange traded funds. He specializes in various uses of option strategies that serve to minimize risk and maximize performance. This includes the buying and selling of option puts and calls, including covered and non-covered types.

In 2009, Mr. Rosa joined the R&R Financial Planners, Inc. team as an Investment Advisor Representative and Equity Portfolio Manager. He holds security licenses that include the Series 4, 7, 63, and 66.

DISCIPLINARY INFORMATION

Mr. Rosa has no criminal or civil actions against him in either a domestic, foreign or military court to report. In addition, there are no administrative proceedings before the SEC or any other proceedings with any self-regulatory organization.

OTHER BUSINESS ACTIVITIES

Mr. Rosa is not engaged in any other investment-related businesses or occupations. Mr. Rosa's outside business activity landscaping represents less than 10% of Mr. Rosa's time and income and therefore are not considered substantial.

ADDITIONAL COMPENSATION

Mr. Rosa does not provide advisory services to individuals that are not clients of R&R Financial Planners, Inc. and therefore does not receive additional compensation for providing such advisory services.

SUPERVISION

Mr. Bill Romeo, Chief Executive Officer & Chief Compliance Officer is responsible for the supervision of Mr. Rosa. Mr. Romeo can be reached at (516) 222-8850. Mr. Romeo performs periodic reviews of client accounts as well as actively communicates with clients to be sure they are receiving proper guidance.