

FORM ADV PART 2A  
DISCLOSURE BROCHURE



STRATEGIC  
PLANNING GROUP

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This brochure provides information about the qualifications and business practices of Strategic Planning Group. Being registered as a registered investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at 801-627-2200. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority.

Additional information about Strategic Planning Group (IARD#113844) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**MARCH 26, 2024**

## **Item 2: Material Changes**

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### **Annual Update**

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of our Form ADV Part 2A Disclosure Brochure.

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### **Material Changes since the Last Update**

Since the last annual updating amendment filing submitted to regulators on February 10, 2023, the following changes have been made:

- Item 12 has been updated regarding our block trading practices. Strategic Planning Group does not place block trades (i.e., aggregate trades for multiple Clients' accounts for an average share price). Therefore, some Clients may pay higher costs than other Clients may pay for the same securities. Sub-Advisors may or may not aggregate trades for Client accounts across multiple Client accounts or models. Please review the relevant Sub-Adviser's disclosure documents regarding their policies on trade aggregation.
- Item 14 has been updated to disclose sponsorship from fund companies for Client events.
- We will not be using the SmartX platform; therefore, all related disclosures to the SmartX platform have been removed.
- Item 6 of our ADV Part 2B brochure supplements has been updated with information regarding the supervision of our firm's investment adviser representatives.

On March 26, 2024, we submitted our required annual updating amendment filing for the fiscal year 2023. We made the following material changes:

- Item 5 was updated to include important information regarding important considerations regarding the purchase of insurance products.
- Items 12 and 14 were updated regarding our custodial relationship with Schwab and the inherent related conflicts of interest, including economic benefits available to us through Schwab and other broker-dealers/custodians we use.

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### **Full Brochure Available**

This Firm Brochure being delivered is the complete brochure for the Firm. In addition to the changes referenced above, we encourage you to review this entire brochure. If you have questions or would like to receive a copy of our current brochure at any time, free of charge, please contact Jeff Draper, Chief Compliance Officer at [jeff@strategicutah.com](mailto:jeff@strategicutah.com) or 801-627-2200.

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## Item 4: Advisory Business

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### **Firm Description**

Strategic Planning Group, LLC doing business as Strategic Planning Group was formed as a Registered Investment Advisor in August 1999. Ryan Craner is the principal owner.

Strategic Planning Group is a fee-based financial planning and investment management firm. Investment Advisor Representatives of Strategic Planning Group also offer insurance products and services as independent insurance agents.

Strategic Planning Group does not act as a custodian of Client assets.

An evaluation of each Client's initial situation is provided to the Client, often in the form of a net worth statement, risk analysis, or similar document. Periodic reviews are also communicated to provide reminders of the specific courses of action that need to be taken. More frequent reviews occur but are not necessarily communicated to the Client unless immediate changes are recommended.

Other professionals (e.g., lawyers, accountants, tax preparers, insurance agents, etc.) are engaged directly by the Client on an as-needed basis and may charge fees of their own. Conflicts of interest will be disclosed to the Client in the event they should occur.

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### **Types of Advisory Services**

**Asset Management Services:** Strategic Planning Group offers discretionary direct asset management services to advisory Clients. Strategic Planning Group will offer Clients ongoing portfolio management services by determining individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, asset allocation, portfolio monitoring, and the overall investment program will be based on the above factors.

*Discretionary:* When the Client provides Strategic Planning Group discretionary authority the Client will sign a limited trading authorization or equivalent. Strategic Planning Group will have the authority to execute transactions in the account without seeking Client approval on each transaction.

Strategic Planning Group will customize an investment portfolio for the Client according to the Client's risk tolerance, investment objectives, and other factors as described above or Strategic Planning Group will invest the Client's assets according to one or more model portfolios developed by Strategic Planning Group and/or other registered investment advisers. Once the investment portfolio is constructed or a model portfolio developed by Strategic Planning Group or a third party is selected, Strategic Planning Group will monitor the Client's portfolio performance on an ongoing basis and will rebalance the portfolio as indicated by changes in market conditions and the Client's stated financial circumstances as communicated to and as updated from time to time by the Client to Strategic Planning Group. Additionally, from time to time we may also use third-party

managers or separately managed account providers available through the account custodian's platform. Clients will provide discretion for those SMA managers to manage a portion or all of the assets under our supervision for a separate and additional fee.

In the Asset Management Agreement between the Client and Strategic Planning Group, the Client will also grant Strategic Planning Group full discretion to hire Sub-Advisors to manage all or a portion of the assets in the Client account(s). Strategic Planning Group will be responsible for the overall direct relationship with the Client. As such, Strategic Planning Group will have full authority to further delegate such discretionary authority to selected Sub-Advisors to actively manage the Client's portfolio and execute trades on behalf of Strategic Planning Group in Client accounts. Sub-Advisors will maintain the models or investment strategies agreed upon between Sub-Advisor and Strategic Planning Group. Additionally, at Strategic Planning Group's discretion, Strategic Planning Group may grant such Sub-Advisors full authority to further delegate such discretionary investment authority to other investment advisers and service providers. Strategic Planning Group retains the authority to terminate the Sub-Advisor relationship at Strategic Planning Group's discretion and/or to reallocate the Client's assets to other Sub-Advisors where Strategic Planning Group deems such action to be appropriate and suitable for the Client.

When Strategic Planning Group engages a Sub-Advisor, the Client will be provided with a current copy of the Sub-Advisor's Form ADV Brochure, and associated disclosure documents prior to or at the time the Sub-Advisor begins providing services to the Client's account on behalf of Strategic Planning Group. Such documents provide important disclosures and other information about the Sub-Advisor to help the Client understand the scope of the Sub-Advisory services to be provided.

**ERISA Plan Services:** Strategic Planning Group provides service to qualified retirement plans including 401(k) plans, 403(b) plans, pension and profit-sharing plans, cash balance plans, and deferred compensation plans. Strategic Planning Group may act as either a 3(21) or 3(38) advisor:

**Limited Scope ERISA 3(21) Fiduciary:** Strategic Planning Group may serve as a limited scope ERISA 3(21) fiduciary that can advise, help and assist plan sponsors with their investment decisions. As an investment advisor Strategic Planning Group has a fiduciary duty to act in the best interest of the Client. The plan sponsor is still ultimately responsible for the decisions made in their plan, though using Strategic Planning Group can help the plan sponsor delegate liability by following a diligent process.

1. Fiduciary Services are:

- Provide investment advice to the Client about asset classes and investment alternatives available for the Plan in accordance with the Plan's investment policies and objectives. The Client will make the final decision regarding the



initial selection, retention, removal, and addition of investment options. Strategic Planning Group acknowledges that it is a fiduciary as defined in ERISA section 3 (21) (A) (ii).

- Assist the Client in the development of an investment policy statement (“IPS”). The IPS establishes the investment policies and objectives for the Plan. The Client shall have the ultimate responsibility and authority to establish such policies and objectives and to adopt and amend the IPS.
- Provide investment advice to the Plan Sponsor with respect to the selection of a qualified default investment alternative for participants who are automatically enrolled in the Plan or who have otherwise failed to make investment elections. The Client retains the sole responsibility to provide all notices to the Plan participants required under ERISA Section 404(c) (5) and 404(a)-5.
- Assist in monitoring investment options by preparing periodic investment reports that document investment performance, consistency of fund management, and conformance to the guidelines set forth in the IPS and make recommendations to maintain, remove or replace investment options.
- Meet with the Client on a periodic basis to discuss the reports and the investment recommendations.

2. Non-fiduciary Services are:

- Assist in the education of Plan participants about general investment information and the investment alternatives available to them under the Plan. The Client understands Strategic Planning Group’s assistance in education of the Plan participants shall be consistent with and within the scope of the Department of Labor’s definition of investment education (Department of Labor Interpretive Bulletin 96-1). As such, Strategic Planning Group is not providing fiduciary advice as defined by ERISA 3(21)(A)(ii) to the Plan participants. Strategic Planning Group will not provide investment advice concerning the prudence of any investment option or combination of investment options for a particular participant or beneficiary under the Plan.
- Assist in the group enrollment meetings designed to increase retirement plan participation among the employees and investment and financial understanding by the employees.

Strategic Planning Group may provide these services or, alternatively, may arrange for the Plan’s other providers to offer these services, as agreed upon between Strategic Planning Group and the Client.

3. Strategic Planning Group has no responsibility to provide services related to the following types of assets (“Excluded Assets”):

- Employer securities;
- Real estate (except for real estate funds or publicly traded REITs);
- Stock brokerage accounts or mutual fund windows;
- Participant loans;
- Non-publicly traded partnership interests;
- Other non-publicly traded securities or property (other than collective trusts and similar vehicles); or
- Other hard-to-value or illiquid securities or property.

Excluded Assets will **not** be included in calculation of Fees paid to Strategic Planning Group on the ERISA Agreement. Specific services will be outlined in detail to each plan in the 408(b)2 disclosure.

**ERISA 3(38) Investment Manager:** Strategic Planning Group can also act as an ERISA 3(38) Investment Manager in which it has discretionary management and control of a given retirement plan's assets. Strategic Planning Group would then become solely responsible and liable for the selection, monitoring, and replacement of the plan's investment options.

1. Fiduciary Services are:

- Strategic Planning Group has discretionary authority and will make the final decision regarding the initial selection, retention, removal, and addition of investment options in accordance with the Plan's investment policies and objectives.
- Assist the Client with the selection of a broad range of investment options consistent with ERISA Section 404(c) and the regulations thereunder.
- Assist the Client in the development of an investment policy statement ("IPS"). The IPS establishes the investment policies and objectives for the Plan.
- Provide discretionary investment advice to the Plan Sponsor with respect to the selection of a qualified default investment alternative for participants who are automatically enrolled in the Plan or who have otherwise failed to make investment elections. The Client retains the sole responsibility to provide all notices to the Plan participants required under ERISA Section 404(c) (5).

2. Non-fiduciary Services are:

- Assist in the education of Plan participants about general investment information and the investment alternatives available to them under the Plan. The Client understands the Strategic Planning Group's assistance in the education of the Plan participants shall be consistent with and within the scope of the Department of Labor's definition of investment education (Department of Labor Interpretive Bulletin 96-1). As such, the Strategic Planning Group is not providing fiduciary advice as defined by ERISA to the

Plan participants. Strategic Planning Group will not provide investment advice concerning the prudence of any investment option or combination of investment options for a particular participant or beneficiary under the Plan.

- Assist in the group enrollment meetings designed to increase retirement plan participation among the employees and investment and financial understanding by the employees.

Strategic Planning Group may provide these services or, alternatively, may arrange for the Plan's other providers to offer these services, as agreed upon between Strategic Planning Group and the Client.

3. Strategic Planning Group has no responsibility to provide services related to the following types of assets ("Excluded Assets"):

- Employer securities;
- Real estate (except for real estate funds or publicly traded REITs);
- Stock brokerage accounts or mutual fund windows;
- Participant loans;
- Non-publicly traded partnership interests;
- Other non-publicly traded securities or property (other than collective trusts and similar vehicles); or
- Other hard-to-value or illiquid securities or property.

Excluded Assets will **not** be included in calculation of Fees paid to the Adviser on the ERISA Agreement. Specific services will be outlined in detail to each plan in the 408(b)2 disclosure

**Qualified Plan Consulting Services:** Strategic Planning Group offers qualified plan consulting services to individuals on an ongoing basis to current Clients. Strategic Planning Group will meet with the Client for information gathering. Strategic Planning Group will review the investment options available within the plan and then make investment recommendations to the Client based on the investment options available and the Client's financial objectives in a face-to-face meeting.

**Financial Planning and Consulting Services:** Strategic Planning Group offers financial planning and consulting services to individuals. Services include but are not limited to a thorough review of all applicable topics including Wills, Estate Plans/Trusts, Investments, Taxes, and Insurance. A conflict of interest exists between the interests of the investment advisor and the interests of the Client. The Client is under no obligation to act upon the investment advisor's recommendation. If the Client elects to act on any of the recommendations, the Client is under no obligation to effect the transaction through Strategic Planning Group.

**Variable Annuity Management:** Strategic Planning Group offers discretionary direct asset management services to advisory Clients on their variable annuities and variable life products. Strategic Planning Group will work with individuals to assemble an appropriate portfolio of investment options as provided through the

insurance company that services variable annuity investment. The accounts will be monitored on an annual basis.

**Seminars and Workshops Services:** Strategic Planning Group holds seminars and workshops to educate Clients on different types of investments and the different services they offer. The seminars are educational in nature and no specific investment or tax advice is given. Seminars are conducted at the discretion of Strategic Planning Group.

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**Client Tailored Services and Client Imposed Restrictions**

The goals and objectives for each Client are documented in our Client files. Investment strategies are created that reflect the stated goals and objectives. Clients may impose restrictions on investing in certain securities or types of securities. However, restrictions on specific securities, sectors, types of securities, or allocations may not be possible in third-party programs or models; therefore, you may not be able to participate in certain models or Sub-Advisory programs. Agreements may not be assigned without written Client consent.

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**Wrap Fee Programs**

Strategic Planning Group does not sponsor any wrap fee programs.

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**Client Assets under Management**

As of March 8, 2024, Strategic Planning Group had approximately \$513,845,387 in Client assets under management on a discretionary basis and \$0 Client assets under management on a non-discretionary basis.

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**Item 5: Fees and Compensation**

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**Method of Compensation and Fee Schedule**

**Asset Management Services Fees:** Strategic Planning Group offers discretionary asset management services to advisory Clients. Fees for these services will be based on a percentage of the Client's Assets Under Management. Strategic Planning Group's annual fee is negotiable; accounts within the same household may be combined for a reduced fee. The advisory fees are:

<b>Assets Under Management</b>	<b>Annual Fee*</b>
Up to \$250,000	1.75%
\$250,001 to \$1,000,000	1.55%
\$1,000,001 and Above	1.35%

\*If Strategic Planning Group selects a Sub-advisor for the Client's account or portion of the account, the Sub-Advisor's fee will be paid from the annual fee paid to Strategic Planning Group. Where SMA managers are used the total combined fee will not exceed 2.5%. Lower fees may be available through other firms that do not use SMA managers.

Fees are billed monthly in advance. The fee will be calculated using the total market value of the assets in the Client's account as of the last business day of the previous month. Monthly advisory fees deducted from the Client's account(s) by the custodian will be reflected in the custodial statement. Lower fees for comparable services may be available from other sources.

Clients may terminate their Asset Management Agreement within five (5) business days of signing without penalty and with a full refund. Thereafter, either the Client or Strategic Planning Group may terminate the Asset Management Agreement with thirty (30) days written notice to the other party. The Client is entitled to a pro rata refund based on the days service was not provided in the final month. Client shall be given thirty (30) days prior written notice of any increase in fees, and Client will acknowledge, in writing, any agreement of increase in said fees.

**ERISA Plan Services:** The annual fees are based on the market value of the Included Assets and will not exceed 1.5%. The annual fee is negotiable and will be charged as a percentage of the Included Assets. Fees may be charged quarterly or monthly in arrears or in advance based on the assets as calculated by the custodian or record keeper of the Included Assets (without adjustments for anticipated withdrawals by Plan participants or other anticipated or scheduled transfers or distribution of assets). If the services to be provided start any time other than the first day of a quarter or month, the fee will be prorated based on the number of days remaining in the quarter or month. If this Agreement is terminated prior to the end of the billing cycle, Strategic Planning Group shall be entitled to a prorated fee based on the number of days during the fee period services were provided or the Client will be due a prorated refund of fees for days services were not provided in the billing cycle.

The fee schedule, which includes compensation of Strategic Planning Group for the services is described in detail in Schedule A of the ERISA Plan Agreement. The Plan is obligated to pay the fees; however, the Plan Sponsor may elect to pay the fees. Client may elect to be billed directly or have fees deducted from Plan Assets. Strategic Planning Group does not reasonably expect to receive any additional compensation, directly or indirectly, for its services under this Agreement. If additional compensation is received, Strategic Planning Group will disclose this compensation, the services rendered, and the payer of compensation. Strategic Planning Group will offset the compensation against the fees agreed upon under the Agreement.

**Qualified Plan Consulting Services Fees:** Strategic Planning Group does not charge an additional fee for this service. Qualified Plan Consulting Services are only offered to current Clients of Strategic Planning Group who are utilizing other services.

**Financial Planning and Consulting Services Fees:** Strategic Planning Group intends to be compensated for financial planning and consulting services by charging fees on either an hourly basis of \$150 or fixed fee basis of \$1,000. Strategic

Planning Group fees will be negotiated in advance and will be set out in each Client's advisory contract. Payment in full is due upon commencement of the planning process. Completed plans are delivered inside of sixty (60) days. Clients may request to terminate their advisory contract with Strategic Planning Group, in whole or in part, by giving written notice. Upon termination, any fees paid in advance will be prorated to the date of termination and any excess will be refunded to the Client.

**Variable Annuity Management:** The fees for these services will be based on a percentage of Assets Under Management and will not exceed an annual fee of 1.5% of the assets managed. Fees will be disclosed prior to the Client signing the Investment Advisory Agreement.

Strategic Planning Group's fees are billed monthly in advance based on the amount of assets managed as of the close of business on the last business day of the previous month. Monthly advisory fees will be paid in the following ways:

- Deducted from Client's annuity account
- Deducted from another of the client's non-qualified account(s) managed by Strategic Planning Group

The annual fee may be negotiable based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with Clients, etc.). Accounts within the same household may be combined for a reduced fee. Lower fees for comparable services may be available from other sources. Clients may terminate their account within five (5) business days of signing the Investment Advisory Agreement with no obligation and without penalty. Clients may terminate advisory services with thirty (30) days written notice. Client will be entitled to a pro rata refund for the days service was not provided in the final billing period. Client shall be given thirty (30) days prior written notice of any increase in fees, and Client will acknowledge, in writing, any agreement of increase in said fees.

**Seminars and Workshops Services:** Strategic Planning Group does not charge a fee for attendance to seminars and/or workshops.

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### **Client Payment of Fees**

Investment management fees are billed monthly in advance. Fees are usually deducted from a designated Client account to facilitate billing. The Client must consent in advance to direct debiting of their investment account.

ERISA services fees are billed monthly or quarterly, in advance, or in arrears. The Client must consent in advance to direct debiting of their investment account.

Fees for financial plans are due at the commencement of the planning process.

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**Additional Client Fees Charged**

Custodians may charge asset-based fees or transaction fees on purchases or sales of certain mutual funds, equities, bonds, options, and exchange-traded funds. These charges may include mutual fund transaction fees, postage, and handling fees.

For our Client accounts maintained in Fidelity's custody, Fidelity is compensated by account holders through asset-based fees for securities trades that are executed through Fidelity or that settle into Fidelity accounts. These annual fees will be based on either .06% of assets or \$100, whichever is greater.

Strategic Planning Group, in its sole discretion, may waive its minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with Clients, etc.).

For more details on the brokerage practices, see Item 12 of this brochure.

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**Prepayment of Client Fees**

Investment management and Variable Annuity fees and Financial Planning and Consulting fees are due in advance. Upon termination, any fees paid in advance will be prorated to the date of termination and any excess will be refunded to the Client.

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**External Compensation for the Sale of Securities to Clients**

Strategic Planning Group does not receive any external compensation for the sale of securities to Clients, nor do any affiliates of Strategic Planning Group.

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**External Compensation for the Sale of Insurance Products to Clients**

Certain Executive officers and other Associated Persons of our firm are licensed as independent insurance agents. These persons will earn commission-based compensation for selling insurance products, including insurance products they sell to our clients. Insurance commissions earned by these persons are separate from and in addition to our advisory fees. The sale of insurance instruments and other commissionable products offered by Associated Persons are intended to complement our advisory services. However, this practice presents a conflict of interest because persons providing investment advice on behalf of our firm who are insurance agents have an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. We address this conflict of interest by recommending insurance products only where we, in good faith, believe that it is appropriate for the client's particular needs and circumstances and only after a full presentation of the recommended insurance product to our client. In addition, we explain the insurance underwriting process to our clients to illustrate how the insurer also reviews the client's application and disclosures prior to the issuance of a resulting insuring agreement. Clients to whom the firm offers advisory services are informed that they are under no obligation to purchase insurance services. Clients who do choose to purchase insurance services

are under no obligation to use our licensed Associated Persons and may use any insurance agent or provider they choose.

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### **Item 6: Performance-Based Fees and Side-by-Side Management**

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#### **Sharing of Capital Gains**

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

Strategic Planning Group does not use a performance-based fee structure because of the conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the Client.

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### **Item 7: Types of Clients**

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#### **Description**

Strategic Planning Group generally provides investment advice to individuals, high-net-worth individuals, corporations, or business entities. Client relationships vary in scope and length of service.

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#### **Account Minimums**

Strategic Planning Group requires an account minimum of \$25,000 for asset management services. Strategic Planning Group may waive this minimum at their discretion based on circumstances such as Client relationships.

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

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#### **Methods of Analysis**

Security analysis methods may include technical analysis and cyclical analysis. Investing in securities involves the risk of loss that Clients should be prepared to bear. Past performance is not a guarantee of future returns.

Technical analysis involves evaluating securities based on past prices and volume. Cyclical analysis involves analyzing the cycles of the market.

In developing a financial plan for a Client, Strategic Planning Group's analysis may include cash flow analysis, investment planning, risk management, tax planning, and estate conservation. Based on the information gathered, a detailed strategy is tailored to the Client's specific situation.

The main sources of information include financial newspapers and magazines, research material prepared by others, corporate rating services, annual reports, prospectuses, filings with the Securities and Exchange Commission, and company press releases.

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#### **Investment Strategy**

The investment strategy for a specific Client is based on the objectives stated by the Client during consultations. The Client may change these objectives at any time.



Each Client executes an Investment Policy Statement or Risk Tolerance that documents their objectives and their desired investment strategy.

Other strategies may include long-term purchases, short-term purchases, and trading.

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### **Security Specific Material Risks**

All investment programs have certain risks that are borne by the investor. Risks involved in technical analysis are inflation risk, reinvestment risk, and market risk. Cyclical analysis involves inflation risk, market risk, and currency risk.

Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks and should discuss these risks with Strategic Planning Group:

- *Market Risk:* The price of a security, bond, or mutual fund may drop 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.
- *Inflation Risk:* When any type of inflation is present, a dollar today will buy more than a dollar next year, because purchasing power is eroding at the rate of inflation.
- *Currency Risk:* Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- *Reinvestment Risk:* This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- *Liquidity Risk:* Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- *Management Risk:* The advisor's investment approach may fail to produce the intended results. If the advisor's assumptions regarding the performance of a specific asset class or fund are not realized in the expected time frame, the overall performance of the Client's portfolio may suffer.
- *Equity Risk:* Equity securities tend to be more volatile than other investment choices. The value of an individual mutual fund or ETF can be more volatile than the market as a whole. This volatility affects the value of the Client's overall portfolio. Small and mid-cap companies are subject to additional risks. Smaller companies may experience greater volatility, higher failure rates, more limited markets, product lines, financial resources, and less management experience than larger companies. Smaller companies may also

have a lower trading volume, which may disproportionately affect their market price, tending to make them fall more in response to selling pressure than is the case with larger companies.

- *Fixed Income Risk:* The issuer of a fixed income security may not be able to make interest and principal payments when due. Generally, the lower the credit rating of a security, the greater the risk that the issuer will default on its obligation. If a rating agency gives a debt security a lower rating, the value of the debt security will decline because investors will demand a higher rate of return. As nominal interest rates rise, the value of fixed income securities held by a fund is likely to decrease. A nominal interest rate is the sum of a real interest rate and an expected inflation rate.
- *Investment Companies Risk:* When a Client invests in open-end mutual funds or ETFs, the Client indirectly bears their proportionate share of any fees and expenses payable directly by those funds. Therefore, the Client will incur higher expenses, which may be duplicative. In addition, the Client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value or (ii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. Adviser has no control over the risks taken by the underlying funds in which Client invests.
- *Derivatives Risk:* Funds in a Client's portfolio may use derivative instruments. The value of these derivative instruments derives from the value of an underlying asset, currency, or index. Investments by a fund in such underlying funds may involve the risk that the value of the underlying fund's derivatives may rise or fall more rapidly than other investments, and the risk that an underlying fund may lose more than the amount that it invested in the derivative instrument in the first place. Derivative instruments also involve the risk that other parties to the derivative contract may fail to meet their obligations, which could cause losses.
- *Foreign Securities Risk:* Funds in which Clients invest may invest in foreign securities. Foreign securities are subject to additional risks not typically associated with investments in domestic securities. These risks may include, among others, currency risks, country risks (political, diplomatic, regional conflicts, terrorism, war, social and economic instability, currency devaluations, and policies that have the effect of limiting or restricting foreign investment or the movement of assets), different trading practices, less government supervision, less publicly available information, limited trading markets, and greater volatility. To the extent that underlying funds

invest in issuers located in emerging markets, the risk may be heightened by political changes, changes in taxation, or currency controls that could adversely affect the values of these investments. Emerging markets have been more volatile than the markets of developed countries with more mature economies.

- *Long-term purchases:* Long-term investments are those vehicles purchased with the intention of being held for more than one year. Typically the expectation of the investment is to increase in value so that it can eventually be sold for a profit. In addition, there may be an expectation for the investment to provide income. One of the biggest risks associated with long-term investments is volatility, the fluctuations in the financial markets that can cause investments to lose value.
- *Short-term purchases:* Short-term investments are typically held for one year or less. Generally, there is not a high expectation for a return or an increase in value. Typically, short-term investments are purchased for the relatively greater degree of principal protection they are designed to provide. Short-term investment vehicles may be subject to purchasing power risk — the risk that your investment's return will not keep up with inflation.
- *Trading risk:* Investing involves risk, including possible loss of principal. There is no assurance that the investment objective of any fund or investment will be achieved.
- *Options Trading:* The risks involved with trading options are that they are very time-sensitive investments. An options contract is generally a few months. The buyer of an option could lose his or her entire investment even with a correct prediction about the direction and magnitude of a particular price change if the price change does not occur in the relevant time period (i.e., before the option expires). Additionally, options are less tangible than some other investments. An option is a “book-entry” only investment without a paper certificate of ownership.
- *Variable Annuity Risk:* A variable annuity is a form of insurance where the seller or issuer (typically an insurance company) makes a series of future payments to a buyer (annuitant) in exchange for the immediate payment of a lump sum (single-payment annuity) or a series of regular payments (regular-payment annuity). The payment stream from the issuer to the annuitant has an unknown duration based principally upon the date of death of the annuitant. At this point, the contract will terminate, and the remainder of the funds accumulated is forfeited unless there are other annuitants or beneficiaries in the contract. Annuities can be purchased to provide income during retirement. Unlike fixed annuities that make payments in fixed amounts or in amounts that increase by a fixed percentage, variable annuities, pay amounts that vary according to the performance of a specified set of investments, typically bond and equity mutual funds. Many variable

annuities typically impose asset-based sales charges or surrender charges for withdrawals within a specified period. Variable annuities may impose a variety of fees and expenses, in addition to sales and surrender charges, such as mortality and expense risk charges; administrative fees; underlying fund expenses; and charges for special features, all of which can reduce the return. Earnings in a variable annuity do not provide all the tax advantages of 401(k)s and other before-tax retirement plans. Once the investor starts withdrawing money from their variable annuity, earnings are taxed at the ordinary income rate, rather than at the lower capital gains rates applied to other non-tax-deferred vehicles which are held for more than one year. Proceeds of most variable annuities do not receive a "step-up" in cost basis when the owner dies like stocks, bonds, and mutual funds do. Some variable annuities offer "bonus credits." These are usually not free. In order to fund them, insurance companies typically impose mortality and expense charges and surrender charge periods. In an exchange of an existing annuity for a new annuity (so-called 1035 exchanges), the new variable annuity may have a lower contract value and a smaller death benefit; may impose new surrender charges or increase the period of time for which the surrender charge applies; may have higher annual fees; and provide another commission for the broker.

- *Structured Products Risk:* The risks involved with using structured products include liquidity and the credit risk of the issuing investment bank. The products themselves are considered to be the issuing financial institution's liability. During a financial crisis, structured products could possibly lose principal, similar to the risks associated with options. Structured products may not be insured by the Federal Deposit Insurance Corporation (FDIC) but by the issuer itself. If the issuer has liquidity problems or goes bankrupt, investors may lose the initial investment. There is no uniform pricing standard which makes it difficult to compare net pricing across multiple offerings. It is also important to understand that these types of products are considered complex in nature.

### **Selection of Third-Party Models and Sub-Advisors**

In the event Strategic Planning Group selects a Sub-Advisor or third-party model for the management of all or a portion of the Client's assets, Strategic Planning Group will allocate the Client's assets among various classes of securities, Sub-Advisors, or managed model portfolios. If there is a significant deviation in characteristics or performance from the stated strategy and/or benchmark, we may recommend changing models or replacing a Sub-Advisor or model. The primary risk associated with reliance on a Sub-Advisor is that while a particular Sub-Advisor may have demonstrated a certain level of success in the past; it may not be able to replicate that success in future markets. In addition, as we do not control the underlying investments in third-party model portfolios, there is also a risk that a Sub-Advisor may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for our Clients. To mitigate this risk,

we seek Sub-Advisors with proven track records that have demonstrated a consistent level of performance and success over time. A Sub-Advisors' past performance is not a guarantee of future results and certain market and economic risks exist that may adversely affect an account's performance that could result in capital losses in your account. Please refer to the Sub-Advisor's Form ADV Brochure, and associated disclosure documents for details on their specific investment strategies, methods of analysis, and associated risks.

Additionally, our investment committee may use the services of an independent, outside portfolio consultant help review and propose adjustments for our portfolios.

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### **Item 9: Disciplinary Information**

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#### **Criminal or Civil Actions**

Strategic Planning Group and its management have not been involved in any criminal or civil action.

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#### **Administrative Enforcement Proceedings**

Strategic Planning Group and its management have not been involved in administrative enforcement proceedings.

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#### **Self-Regulatory Organization Enforcement Proceedings**

Strategic Planning Group and its management have not been involved in legal or disciplinary events related to past or present investment Clients.

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

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#### **Broker-Dealer or Representative Registration**

Strategic Planning Group is not registered as a Broker-Dealer and no affiliated persons of Strategic Planning Group are registered representatives of a Broker-Dealer.

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#### **Futures or Commodity Registration**

Neither Strategic Planning Group nor its employees are registered or have an application pending to register as a futures commission merchant, commodity pool operator, or commodity trading advisor.

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#### **Material Relationships Maintained by this Advisory Business and Conflicts of Interest**

As disclosed above in Item 5, Investment Advisor Representatives of Strategic Planning Group are also licensed as independent insurance agents.

This practice represents a conflict of interest because it gives Investment Advisor Representatives an incentive to recommend products based on the commission amount received. This conflict is mitigated by the fact that Investment Advisor Representatives have a fiduciary responsibility to place the best interest of the Client first and the Clients are not required to purchase any recommended insurance products. Moreover, if Clients choose to purchase insurance products,

they have the option to purchase insurance products through any insurance agent or provider they choose.

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**Recommendations or Selections of Other Investment Advisors and Conflicts of Interest**

Strategic Planning Group may also utilize the services of a Sub-Advisor to manage Clients' investment portfolios. Sub-Advisors will maintain the models or investment strategies agreed upon between Sub-Advisor and Strategic Planning Group. Sub-Advisors execute all trades on behalf of Strategic Planning Group in Client accounts. Strategic Planning Group will be responsible for the overall direct relationship with the Client. Strategic Planning Group retains the authority to terminate the Sub-Advisor relationship at Strategic Planning Group's discretion.

In addition to the authority granted to Strategic Planning Group, Clients will grant Strategic Planning Group full discretionary authority and authorizes Strategic Planning Group to select and appoint one or more independent investment advisors ("Advisors") to provide investment advisory services to Client without prior consultation with or the prior consent of Client. Such Advisors shall have all of the same authority relating to the management of Client's investment accounts as is granted to Strategic Planning Group in the Agreement. In addition, at Strategic Planning Group's discretion, Strategic Planning Group may grant such Advisors full authority to further delegate such discretionary investment authority to additional Advisors. Strategic Planning Group ensures that before selecting other advisors for Client that the other advisors are properly licensed or registered as investment advisors.

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

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**Code of Ethics Description**

The employees of Strategic Planning Group have committed to a Code of Ethics ("Code"). The purpose of our Code is to set forth standards of conduct expected of Strategic Planning Group employees and address conflicts that may arise. The Code defines acceptable behavior for employees of Strategic Planning Group. The Code reflects Strategic Planning Group and its supervised persons' responsibility to act in the best interest of their Client.

One area the Code addresses is when employees buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our Clients. We do not allow any employees to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our Clients.

Strategic Planning Group policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other employee, officer, or director of Strategic Planning Group may recommend any transaction in a security or its derivative to advisory Clients or engage in personal

securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

Strategic Planning Group's Code is based on the guiding principle that the interests of the Client are our top priority. Strategic Planning Group's officers, directors, advisors, and other employees have a fiduciary duty to our Clients and must diligently perform that duty to maintain the complete trust and confidence of our Clients. When a conflict arises, it is our obligation to put the Client's interests over the interests of either employees or the company.

The Code applies to "access" persons. "Access" persons are employees who have access to non-public information regarding any Clients' purchase or sale of securities, or non-public information regarding the portfolio holdings of any reportable fund, who are involved in making securities recommendations to Clients, or who have access to such recommendations that are non-public.

Strategic Planning Group will provide a copy of the Code of Ethics to any Client or prospective Client upon request.

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### **Investment Recommendations Involving a Material Financial Interest and Conflict of Interest**

Strategic Planning Group and its employees do not recommend to Clients securities in which there is a material financial interest.

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### **Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest**

Strategic Planning Group and its employees may buy or sell securities that are also held by Clients. In order to mitigate conflicts of interest such as front running, employees are required to disclose all reportable securities transactions as well as provide Strategic Planning Group with copies of their brokerage statements.

The Chief Compliance Officer of Strategic Planning Group is Jeff Draper. He reviews all employee trades each quarter. The personal trading reviews ensure that the personal trading of employees does not affect the markets and that Clients of the firm receive preferential treatment over employee transactions.

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### **Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest**

Strategic Planning Group does not maintain a firm proprietary trading account and does not have a material financial interest in any securities being recommended. However, employees may buy or sell the same securities they buy or sell for Clients, which may pose a conflict of interest with clients. In an effort to uphold our fiduciary duties to clients, employees' securities transactions will generally be "last in" and "last out" for the trading day when trading occurs in close proximity to client trades. Front running (trading shortly ahead of clients) is prohibited. Should a conflict occur because of materiality (e.g., a thinly traded stock), disclosures will be made to the client(s) at the time of trading. Incidental trading not deemed to be a conflict (e.g., a purchase or sale that is minimal in relation to the total outstanding

value, and as such would have a negligible effect on the market price) would not be deemed a material conflict requiring disclosure at the time of trading. Additionally, employees are required to disclose all reportable securities transactions as well as provide Strategic Planning Group with copies of their brokerage statements.

The Chief Compliance Officer of Strategic Planning Group is Jeff Draper. He reviews all employee trades each quarter. The personal trading reviews ensure that the personal trading of employees does not affect the markets and that Clients of the firm receive preferential treatment over employee transactions.

## **Item 12: Brokerage Practices**

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### **Factors Used to Select Broker-Dealers for Client Transactions**

Strategic Planning Group requires the use of a particular broker-dealer. Strategic Planning Group will select appropriate brokers based on a number of factors including but not limited to their relatively low transaction fees and reporting ability. Strategic Planning Group relies on its broker to provide its execution services at the best prices available. Lower fees for comparable services may be available from other sources. Clients pay for any and all custodial fees in addition to the advisory fee charged by Strategic Planning Group.

### **Custodian(s) and Broker(s) We Use**

Our firm will not maintain custody of your assets that we manage, although we are deemed to have custody of your assets if you give us authority to withdraw assets from your account (see Item 15—Custody, below). Your assets must be maintained in an account at a “qualified custodian,” generally a broker-dealer, bank, or trust company, for example. We routinely recommend that our clients use Fidelity Brokerage Services and/or its affiliates, (collectively “Fidelity”) or Charles Schwab & Co., Inc. (“Schwab”), both registered broker-dealers, members SIPC, as the qualified custodian.

We are independently owned and operated and are not affiliated with any broker-dealer/custodian. Selected broker-dealers/custodians will hold your assets in a brokerage account and buy and sell securities when we or you instruct them to. While we recommend that you use a particular broker-dealer/custodian, you will decide whether to do so and will open your account with the selected firm by entering into an account agreement directly with them. Conflicts of interest associated with these arrangements are described below as well as in Item 14 (Client Referrals and Other Compensation). You should consider these conflicts of interest when selecting your custodian.

We do not open the account for you, although we may assist you in doing so. Not all advisors require their clients to use a particular broker-dealer or custodian.

From time-to-time, we may still use other brokers to execute trades for your account as described below. Defined benefit or defined contribution plans may be held elsewhere as selected by the plan sponsor.



## **How We Select Brokers/Custodians**

When considering whether the terms that a broker-dealer/custodian provides are, overall, most advantageous to you when compared with other available providers and their services, we take into account a wide range of factors, including:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody)
- Capability to execute, clear, and settle trades (buy and sell securities for your account)
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payments, etc.)
- Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds (ETFs), etc.)
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices
- Reputation, financial strength, security and stability
- Prior service to us and our clients
- Services delivered or paid for by Schwab
- Availability of other products and services that benefit us, as discussed below

## **Your Brokerage and Custody Costs at Schwab**

For our clients' accounts that Schwab maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. Certain trades (for example, certain mutual funds and ETFs) do not incur Schwab commissions or transaction fees. Schwab is also compensated by earning interest on the uninvested cash in your account in Schwab's Cash Features Program. In addition to transaction fees, Schwab charges you a flat dollar amount as a "prime broker" or "trade away" fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your Schwab account. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we will have Schwab execute most trades for your account.

We are not required to select the broker or dealer that charges the lowest transaction cost, even if that broker provides execution quality comparable to other brokers or dealers. Although we are not required to execute all trades through Schwab, we have determined that having Schwab execute most trades is consistent with our duty to seek "best execution" of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see "How We Select Brokers/Custodians"). By using another broker or dealer you may pay lower transaction costs.

## **Research and Other Soft Dollar Benefits**

Although the following products and services are not purchased with “soft dollar” credits, we will receive certain economic benefits (soft dollar benefits) from Schwab in the form of access to Schwab’s institutional brokerage and support services at no additional cost or a discounted cost. Below is a detailed description of Schwab’s support services:

### **Products and Services Available to Us from Schwab**

Schwab Advisor Services™ is Schwab’s business serving independent investment advisory firms like ours. They provide our clients and us with access to their institutional brokerage services (trading, custody, reporting, and related services), many of which are not typically available to Schwab retail customers. However, certain retail investors may be able to get institutional brokerage services from Schwab without going through us. Schwab also makes available various support services. Some of those services help us manage or administer our clients’ accounts, while others help us manage and grow our business. Schwab’s support services are generally available on an unsolicited basis (we don’t have to request them) and at no charge to us.

***Services that Benefit You:*** Schwab’s institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab’s services described in this paragraph generally benefit you and your account.

***Services that Do Not Directly Benefit You:*** Schwab also makes available to us other products and services that benefit us but do not directly benefit you or your account. These products and services assist us in managing and administering our clients’ accounts and operating our firm. They include investment research, both Schwab’s own and that of third parties. We use this research to service all or a substantial number of our clients’ accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- provide access to client account data (such as duplicate trade confirmations and account statements)
- facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- provide pricing and other market data
- facilitate payment of our fees from our clients’ accounts
- assist with back-office functions, recordkeeping, and client reporting

***Services that Generally Benefit Only Us:*** Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events

- Consulting on technology and business needs
- Consulting on legal and compliance-related needs
- Publications and conferences on practice management and business succession
- Access to employee benefits providers, human capital consultants, and insurance providers
- Marketing consulting and support
- Recruiting and custodial search consulting

Schwab provides some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab also discounts or waives its fees for some of these services or pays all or a part of a third party's fees. Schwab also provides us with other benefits, such as occasional business entertainment for our personnel. If you did not maintain your account with Schwab, we would be required to pay for those services from our own resources.

Our firm understands its duty for best execution and considers all factors in making recommendations to clients. These research services may be useful in servicing all clients and may not be used in connection with any particular account that may have paid compensation to the firm providing such services. While we may not always obtain the lowest commission rate, we believe the rate is reasonable in relation to the value of the brokerage and research services provided.

### **Our Interest in Schwab's Services**

The availability of these services from Schwab benefits us because we do not have to produce or purchase them. We don't have to pay for Schwab's services.

Schwab has also agreed to pay for certain technology, research, marketing, and compliance consulting products and services on our behalf once the value of our clients' assets in accounts at Schwab reaches certain thresholds.

The fact that we receive these benefits from Schwab is an incentive for us to recommend the use of Schwab rather than making such a decision based exclusively on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a conflict of interest. We believe, however, that taken in the aggregate our recommendation of Schwab as custodian and broker is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Schwab's services (see "How We Select Brokers/Custodians") and not Schwab's services that benefit only us.

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### **Directed Brokerage**

Strategic Planning Group does not allow Clients to direct brokerage. Not all advisers require Clients to direct brokerage. By directing brokerage, Strategic Planning Group may be unable to achieve most favorable execution of Client transactions which may cost Clients more money.

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**Best Execution**

Investment advisors who manage or supervise Client portfolios have a fiduciary obligation of best execution. The determination of what may constitute best execution and price in the execution of a securities transaction by a broker involves a number of considerations and is subjective. Factors affecting brokerage selection include the overall direct net economic result to the portfolios, the efficiency with which the transaction is effected, the ability to effect the transaction where a large block is involved, the operational facilities of the broker-dealer, the value of an ongoing relationship with such broker and the financial strength and stability of the broker. Strategic Planning Group does not receive any portion of the trading fees.

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**Soft Dollar Arrangements**

The Securities and Exchange Commission defines soft dollar practices as arrangements under which products or services other than execution services are obtained by Strategic Planning Group from or through a broker-dealer in exchange for directing Client transactions to the broker-dealer. As permitted by Section 28(e) of the Securities Exchange Act of 1934, Strategic Planning Group receives economic benefits as a result of commissions generated from securities transactions by the broker-dealer from the accounts of Strategic Planning Group. These benefits include both proprietary research from the broker and other research written by third parties.

A conflict of interest exists when Strategic Planning Group receives soft dollars. This conflict is mitigated by the fact that Strategic Planning Group has a fiduciary responsibility to act in the best interest of its Clients and the services received are beneficial to all Clients.

Strategic Planning Group utilizes the services of custodial broker-dealers. Economic benefits are received by Strategic Planning Group which would not be received if Strategic Planning Group did not give investment advice to Clients. These benefits include a dedicated trading desk, a dedicated service group, and an account services manager dedicated to Strategic Planning Group's accounts, the ability to conduct "block" Client trades, electronic download of trades, balances, and positions, duplicate and batched Client statements, and the ability to have advisory fees directly deducted from Client accounts.

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**Aggregating Securities Transactions for Client Accounts**

Strategic Planning Group does not place block trades (i.e., aggregate trades for multiple Clients' accounts for an average share price). Therefore, some Clients may pay higher costs than other Clients may pay for the same securities. Sub-Advisors may or may not aggregate trades for Client accounts across multiple Client accounts or models. Please review the relevant Sub-Adviser's disclosure documents regarding their policies on trade aggregation.

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### **Item 13: Review of Accounts**

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#### **Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved**

Account reviews are performed quarterly by Investment Advisor Representatives of Strategic Planning Group. Account reviews are performed more frequently when market conditions dictate. Financial planning relationships are considered complete at the delivery of the plan.

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#### **Review of Client Accounts on a Non-Periodic Basis**

Other conditions that may trigger a review of Clients' accounts are changes in tax laws, new investment information, and changes in a Client's own situation.

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#### **Content of Client Provided Reports and Frequency**

Clients receive written account statements no less than quarterly for managed accounts. Account statements are issued by Strategic Planning Group's custodian. Client receives confirmations of each transaction in the account from the Custodian and an additional statement during any month in which a transaction occurs.

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

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#### **Economic Benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest**

Strategic Planning Group from time to time refers Clients to an unaffiliated attorney for estate planning. The attorney pays Strategic Planning Group a fee for acting as the "paralegal" and notarizing documents. This presents a conflict of interest as Strategic Planning Group has an incentive to refer Clients to attorneys with whom they have such compensation arrangements. However, Clients are not obligated to use any particular attorney or law firm for legal services and may use any legal professional they choose.

Strategic Planning Group and its associated persons may receive additional compensation from product sponsors. However, such compensation will not be tied to the sales of any products. Compensation could include such items as gifts of a de minimis value; an occasional dinner or ticket to a sporting event; reimbursement in connection with educational meetings with an associated person, Client workshops, or events; or marketing events or advertising initiatives, including services for identifying prospective Clients. Product sponsors may also pay for or reimburse Strategic Planning Group for the costs associated with its associate persons attending various education or training events, as well as Strategic Planning Group sponsored conferences and events. These practices represent conflicts of interest because they give Strategic Planning Group an incentive to recommend products based on the sponsorship amount or other compensation received. These conflicts are mitigated by disclosures, procedures, and Strategic Planning Group's fiduciary obligation to act in the Client's best interest.

As described in Item 12 above, we receive economic benefits from our custodial broker-dealer(s) in the form of support products and services they make available to

us and other independent investment advisors whose clients maintain their accounts at these custodial broker-dealer(s). The availability of custodial products and services is not dependent upon or based on the specific investment advice we provide our clients, such as buying or selling specific securities or specific types of securities for our clients. The products and services provided by the custodial broker-dealer(s), how they benefit us, and the related conflicts of interest are described above (see Item 12 – Brokerage Practices).

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**Advisory Firm Payments for Client Referrals**

Strategic Planning Group does not directly or indirectly compensate any person or entity who is not our supervised person for Client referrals.

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**Item 15: Custody**

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**Account Statements**

All assets are held at qualified custodians, which means the custodians provide account statements directly to Clients at their address of record. Clients are urged to compare the account statements received directly from their custodians to the performance report statements prepared by Strategic Planning Group.

Strategic Planning Group is deemed to have constructive custody solely because advisory fees are directly deducted from the Client's account(s) by the custodian on behalf of Strategic Planning Group.

Strategic Planning Group is also deemed to have limited custody due to its Third-Party Standing Letters of Authorization ("SLOA").

Strategic Planning Group and its qualified custodian meet the following seven (7) conditions in order to avoid maintaining full custody and be subject to the surprise exam requirement:

1. The Client provides an instruction to the qualified custodian, in writing, that includes the Client's signature, the third party's name, and either the third party's address or the third party's account number at a custodian to which the transfer should be directed.
2. The Client authorizes Strategic Planning Group, in writing, either on the qualified custodian's form or separately, to direct transfers to the third party either on a specified schedule or from time to time.
3. The Client's qualified custodian performs appropriate verification of the instruction, such as a signature review or other method to verify the Client's authorization, and provides a transfer of funds notice to the Client promptly after each transfer.
4. The Client has the ability to terminate or change the instruction to the Client's qualified custodian.

5. Strategic Planning Group has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the Client's instruction.
6. Strategic Planning Group maintains records showing that the third party is not a related party nor located at the same address as Strategic Planning Group.

The Client's qualified custodian sends the Client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

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### **Item 16: Investment Discretion**

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#### **Discretionary Authority for Trading**

Generally, Clients grant Strategic Planning Group complete discretion over the selection and amount of securities to be bought or sold for their account (within the parameters established by their Advisory Agreement) without obtaining their consent or approval. Strategic Planning Group will allow Clients to place certain restrictions on accounts which will be handled on a Client-by-Client basis. However, these purchases may be subject to specified investment objectives and guidelines. For example, a Client may specify that the investment in any particular stock or industry should not exceed specified percentages of the value of the portfolio.

Discretionary authority will only be authorized upon full disclosure to the Client and by that Client specifically authorizing said authority through the execution of an Investment Advisory Agreement. All discretionary trades made by Strategic Planning Group on behalf of their discretionary accounts (Clients) will be in accordance with that Client's investment objectives and goals.

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### **Item 17: Voting Client Securities**

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#### **Proxy Votes**

Strategic Planning Group does not vote proxies on securities. Clients are expected to vote their own proxies. The Client will receive their proxies directly from the custodian of their account or a transfer agent.

When assistance on voting proxies is requested, Strategic Planning Group will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client.

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### **Item 18: Financial Information**

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#### **Balance Sheet**

A balance sheet is not required to be provided because Strategic Planning Group does not serve as a custodian for Client funds or securities and Strategic Planning Group does not require prepayment of fees of more than \$1200 per Client and six months or more in advance.

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**Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients**

Strategic Planning Group has no condition that is reasonably likely to impair our ability to meet contractual commitments to our Clients.

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**Bankruptcy Petitions during the Past Ten Years**

Neither Strategic Planning Group nor its management has had any bankruptcy petitions in the last ten years.



# SUPERVISED PERSON BROCHURE

FORM ADV PART 2B

Ryan Eugene Craner



STRATEGIC  
PLANNING GROUP

**Office Address:**

190 South Main Street  
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Telephone: 801-627-2200

Facsimile: 801-627-2205

[RCraner@SPGUtah.com](mailto:RCraner@SPGUtah.com)

[www.SPGUtah.com](http://www.SPGUtah.com)

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

Additional information about Ryan Craner (CRD#1752377) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**MARCH 26, 2024**

## Brochure Supplement (Part 2B of Form ADV)

### Supervised Person Brochure

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**Principal Executive Officer - Ryan Eugene Craner**

Year of birth: 1963

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#### Item 2 Educational Background and Business Experience

##### *Business Experience:*

- Craner Holdings, LLC, Managing Member, 04/2021 - Present
- Strategic Capital Enterprises LLC; Managing Member; 12/2015 – 4/2021
- Strategic Planning Group; President/Investment Advisor Representative; 08/1999 – Present
- Action Recovery Group; Owner; 05/2011 – Present
- Purshe Kaplan Sterling Investments, Inc.; Registered Representative; 11/2017 – 01/2022
- Ryan E. Craner; Notary Public; 07/1998 – Present
- Ryan E. Craner; Independent Insurance Agent; 08/1985 – Present
- Capital Concepts Financial Services Corp.; President; 07/1985 – Present

##### *Educational Background:*

- Weber State University; Finance; 1985 - 1986
- 

#### Item 3 Disciplinary Information

*Criminal or Civil Action:* None to report.

*Administrative Proceeding:* None to report.

*Self-Regulatory Proceeding:* None to report.

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#### Item 4 Other Business Activities

Ryan Craner has a financial industry affiliated business as an insurance agent. From time to time, he may offer Clients advice or products from this activity.

This practice represents a conflict of interest because it gives Mr. Craner an incentive to recommend products based on the commission/fee amount received. This conflict is mitigated by the fact that Mr. Craner has a fiduciary responsibility to place the best interest of the Client first and the Clients are not required to purchase any products. Moreover, Clients have the option to purchase these products through any insurance agent or provider they choose.

In addition, Mr. Craner is the President of Capital Concepts Financial Services, Inc. In this capacity, he manages the facility and the personnel. Mr. Craner is also the Managing Manager of Craner Holdings, LLC which is his personal real estate holding company. These relationships create no conflicts of interest as Clients of Strategic Planning Group will not be solicited for services offered by Capital Concepts Financial Services, Inc. or Craner Holdings, LLC and vice versa.

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#### Item 5 Additional Compensation

Ryan Craner receives additional compensation in his additional roles, but he does not receive any performance-based fees.

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#### Item 6 Supervision

As President of Strategic Planning Group, Ryan Craner does not report directly to other persons. He is responsible for the overall supervision of the firm's personnel and advisory activities. If you

have questions about the supervision of the firm's representatives, Mr. Craner can be reached at [rcraner@spgutah.com](mailto:rcraner@spgutah.com) or 801-627-2200.

The firm has implemented a Code of Ethics and an internal compliance program that guides the firm and its personnel in complying with applicable state and federal securities laws and in meeting their fiduciary obligations to Clients. Jeff Draper, the firm's Chief Compliance Officer is responsible for the implementation and supervision of the firm's Code of Ethics and compliance program.

As investment representatives of the firm, both Mr. Craner and Mr. Draper are responsible for monitoring Client portfolios for investment objectives and other supervisory reviews. If you have questions or would like to receive a copy of the firm's Code of Ethics, Mr. Draper can be reached at [jeff@strategicutah.com](mailto:jeff@strategicutah.com) or 801-627-2200.

# SUPERVISED PERSON BROCHURE

FORM ADV PART 2B

William J. Draper



STRATEGIC  
PLANNING GROUP

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This brochure supplement provides information about William J. Draper and supplements the Strategic Planning Group brochure. You should have received a copy of that brochure. Please contact William J. Draper if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about William J. Draper (CRD#4907513) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**MARCH 26, 2024**

## Brochure Supplement (Part 2B of Form ADV)

### Principal Executive Officer

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**William Jeffrey Draper (“Jeff”)**

Year of birth: 1981

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### Item 2 Educational Background and Business Experience

#### *Business Experience:*

- Strategic Planning Group; Chief Compliance Officer/Investment Advisor Representative; 06/2021 – Present
- Self Employed; Web Administrator/Developer; 06/2021 – 10/2021
- Foresight Wealth Management, LLC; 401K Operations; 06/2019 – 05/2021
- Utah Retirement Systems; Retirement Planning Advisor; 10/2016 – 06/2019

#### *Educational Background:*

- University of Utah; Bachelor of Science; Finance; 2007
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### Item 3 Disciplinary Information

A. Jeff Draper has never been involved in a criminal or civil action in a domestic, foreign or military court of competent jurisdiction for which he:

1. Was convicted of, or pled guilty or nolo contendere (“no contest”) to (a) any felony; (b) misdemeanor that involved investments or an investment-related business, fraud, false statement or omissions, wrongful taking of property, bribery, perjury, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;
2. Is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;
3. Was found to have been involved in a violation of an investment-related statute or regulation; or
4. Was the subject of any order, judgement or decree permanently or temporarily enjoining, or otherwise limiting, him from engaging in any investment related activity, or from violating any investment-related statute, rule, or order.

B. Jeff Draper never had an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which he:

1. Was found to have caused an investment-related business to lose its authorization to do business; or the subject of an order by the agency or authority;
2. Was found to have been involved in a violation of an investment-related statute or regulation or was the subject of an order by the agency or authority  
(a) denying, suspending or revoking the authorization of the supervised person to act in an investment-related business; (b) barring or suspending his association with an investment-related business; (c) otherwise significantly limiting his investment-related activities; or (d) imposing a civil money penalty of more than \$2,500 on him.

C. Jeff Draper has never been the subject of a self-regulatory organization (SRO) proceeding in which he:

1. Was found to have caused an investment-related business to lose its authorization to do business; or

2. Was found to have been involved in a violation of the SRO's rules and was: (a) barred or suspended from membership or from association with other members, or was expelled from membership; (b) otherwise significantly limited from investment-related activities; or (c) fined more than \$2,500.
- D. Jeff Draper has not been involved in any other hearing or formal adjudication in which a professional attainment, designation, or license of the supervised person was revoked or suspended because of a violation of rules relating to professional conduct.
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#### **Item 4 Other Business Activities**

Mr. Draper has no other business to disclose.

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#### **Item 5 Additional Compensation**

Mr. Draper does not receive any additional compensation or performance-based fees.

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#### **Item 6 Supervision**

The firm has implemented a Code of Ethics and an internal compliance program that guides the firm and its personnel in complying with applicable state and federal securities laws and in meeting their fiduciary obligations to Clients. As an investment representative of the firm, Jeff Draper is responsible for monitoring Client portfolios for investment objectives and other supervisory reviews. As the firm's Chief Compliance Officer, Mr. Draper is responsible for the implementation and supervision of the firm's Code of Ethics and compliance program. Mr. Draper reports directly to Mr. Ryan Craner, President of Strategic Planning Group. Mr. Craner can be reached at [rcraner@spgutah.com](mailto:rcraner@spgutah.com) or 801-627-2200.

If you have questions or would like to receive a copy of the firm's Code of Ethics, Mr. Draper can be reached at [jeff@strategicutah.com](mailto:jeff@strategicutah.com) or 801-627-2200.

# SUPERVISED PERSON BROCHURE

FORM ADV PART 2B

John Michael Park



STRATEGIC  
PLANNING GROUP

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[John@SPGUtah.com](mailto:John@SPGUtah.com)

[www.SPGUtah.com](http://www.SPGUtah.com)

This brochure supplement provides information about John Park and supplements the Strategic Planning Group's brochure. You should have received a copy of that brochure. Please contact John Park if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about John Park (CRD#6166417) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**MARCH 26, 2024**

## Brochure Supplement (Part 2B of Form ADV)

### Supervised Person Brochure

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**Principal Executive Officer - John Michael Park**

Year of birth: 1985

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#### Item 2 Educational Background and Business Experience

##### *Business Experience:*

- Strategic Planning Group; Investment Advisor Representative; 12/2014 – Present
- John M. Park, Sole Proprietor; Independent Insurance Agent; 10/2014 – Present
- John M. Park, Sole Proprietor; Online Retailer; 01/2021 – Present
- Purshe Kaplan Sterling Investments, Inc.; Registered Representative; 11/2017 – 09/2020

##### *Educational Background:*

- Weber State University; Associates Degree – General Studies; 2011
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#### Item 3 Disciplinary Information

*Criminal or Civil Action:* None to report.

*Administrative Proceeding:* None to report.

*Self-Regulatory Proceeding:* None to report.

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#### Item 4 Other Business Activities

John Park has a financial industry affiliated business as an insurance agent. From time to time, he may offer Clients advice or products from this activity.

This practice represents a conflict of interest because it gives Mr. Park an incentive to recommend products based on the fee amount received. This conflict is mitigated by the fact that Mr. Park has a fiduciary responsibility to place the best interest of the Client first and the Clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent, of their choosing.

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#### Item 5 Additional Compensation

John Park receives additional compensation in his capacity as an insurance agent and online retailer, but he does not receive any performance-based fees.

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#### Item 6 Supervision

The firm has implemented a Code of Ethics and an internal compliance program that guides the firm and its personnel in complying with applicable state and federal securities laws and in meeting their fiduciary obligations to Clients. As an investment representative of the firm, John Park is responsible for monitoring Client portfolios for investment objectives and other account reviews. Mr. Park is supervised by Mr. Ryan Craner, President of Strategic Planning Group. Mr. Craner can be reached at [rcraner@spgutah.com](mailto:rcraner@spgutah.com) or 801-627-2200.

Jeff Draper, the firm's Chief Compliance Officer is responsible for the implementation and supervision of the firm's Code of Ethics and compliance program. If you have questions or would like to receive a copy of the firm's Code of Ethics, Mr. Draper can be reached at [jeff@strategicutah.com](mailto:jeff@strategicutah.com) or 801-627-2200.



# SUPERVISED PERSON BROCHURE

FORM ADV PART 2B

Thomas James Craner



STRATEGIC  
PLANNING GROUP

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[tom@spgutah.com](mailto:tom@spgutah.com)

[www.SPGUtah.com](http://www.SPGUtah.com)

This brochure supplement provides information about Thomas Craner and supplements the Strategic Planning Group brochure. You should have received a copy of that brochure. Please contact Thomas Craner if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Thomas James Craner (CRD#6488075) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**MARCH 26, 2024**

## Brochure Supplement (Part 2B of Form ADV)

### Supervised Person Brochure

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**Thomas James Craner**

Year of birth: 1990

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#### Item 2 Educational Background and Business Experience

##### *Business Experience:*

- Strategic Planning Group; Investment Advisor Representative; 06/2019 – Present
- Thomas Craner, Sole Proprietor; Independent Insurance Agent; 09/2020 – Present
- Strategic Planning Group; Operations Manager; 01/2017 – 06/2019
- Capital Concepts; Client Services; 01/2017 – 02/2021
- Purshe Kaplan Sterling Investments; Registered Representative; 11/2017 – 12/2021

##### *Educational Background:*

- Conservatory of Recording Arts and Sciences; Certificate of Audio Engineering; 2011
- 

#### Item 3 Disciplinary Information

A. Thomas Craner has never been involved in a criminal or civil action in a domestic, foreign or military court of competent jurisdiction for which he:

1. Was convicted of, or pled guilty or nolo contendere (“no contest”) to (a) any felony; (b) misdemeanor that involved investments or an investment-related business, fraud, false statement or omissions, wrongful taking of property, bribery, perjury, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;
2. Is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;
3. Was found to have been involved in a violation of an investment-related statute or regulation; or
4. Was the subject of any order, judgement or decree permanently or temporarily enjoining, or otherwise limiting, him from engaging in any investment related activity, or from violating any investment-related statute, rule, or order.

B. Thomas Craner never had an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which he:

1. Was found to have caused an investment-related business to lose its authorization to do business; or the subject of an order by the agency or authority;
2. Was found to have been involved in a violation of an investment-related statute or regulation or was the subject of an order by the agency or authority (a) denying, suspending or revoking the authorization of the supervised person to act in an investment-related business; (b) barring or suspending his association with an investment-related business; (c) otherwise significantly limiting his investment-related activities; or (d) imposing a civil money penalty of more than \$2,500 on him.

C. Thomas Craner has never been the subject of a self-regulatory organization (SRO) proceeding in which he:

1. Was found to have caused an investment-related business to lose its authorization to do business; or

2. Was found to have been involved in a violation of the SRO's rules and was: (a) barred or suspended from membership or from association with other members, or was expelled from membership; (b) otherwise significantly limited from investment-related activities; or (c) fined more than \$2,500.
- D. Thomas Craner has not been involved in any other hearing or formal adjudication in which a professional attainment, designation, or license of the supervised person was revoked or suspended because of a violation of rules relating to professional conduct.
- 

#### **Item 4 Other Business Activities**

Thomas Craner has a financial industry affiliated business as an insurance agent. From time to time, he may offer Clients advice or products from this activity.

This practice represents a conflict of interest because it gives Mr. Craner an incentive to recommend products based on the fee amount received. This conflict is mitigated by the fact that Mr. Craner has a fiduciary responsibility to place the best interest of the Client first and the Clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent, of their choosing.

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#### **Item 5 Additional Compensation**

Thomas Craner receives additional compensation in his capacity as an insurance agent, but he does not receive any performance-based fees.

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#### **Item 6 Supervision**

The firm has implemented a Code of Ethics and an internal compliance program that guides the firm and its personnel in complying with applicable state and federal securities laws and in meeting their fiduciary obligations to Clients. As an investment representative of the firm, Thomas Craner is responsible for monitoring Client portfolios for investment objectives and other account reviews. Thomas Craner is supervised by Mr. Ryan Craner, President of Strategic Planning Group. Mr. Craner can be reached at [rcraner@spgutah.com](mailto:rcraner@spgutah.com) or 801-627-2200.

Jeff Draper, the firm's Chief Compliance Officer is responsible for the implementation and supervision of the firm's Code of Ethics and compliance program. If you have questions or would like to receive a copy of the firm's Code of Ethics, Mr. Draper can be reached at [jeff@strategicutah.com](mailto:jeff@strategicutah.com) or 801-627-2200.

# SUPERVISED PERSON BROCHURE

FORM ADV PART 2B

Alexander G. Craner



STRATEGIC  
PLANNING GROUP

**Office Address:**

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[alex@strategicutah.com](mailto:alex@strategicutah.com)

[www.SPGUtah.com](http://www.SPGUtah.com)

This brochure supplement provides information about Alexander Craner and supplements the Strategic Planning Group brochure. You should have received a copy of that brochure. Please contact Alexander Craner if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Alexander Gordon Craner (CRD#7370986) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**MARCH 26, 2024**

## Brochure Supplement (Part 2B of Form ADV)

### Supervised Person Brochure

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Alexander G. Craner

Year of birth: 1996

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#### Item 2 Educational Background and Business Experience

##### *Business Experience:*

- Strategic Planning Group
  - Investment Advisor Representative; 05/2021 – Present
  - Client Services/Administrative Assistant; 06/2019 – Present
- Alexander Craner, Sole Proprietor; Insurance Agent; 10/2021 – Present
- JP Morgan Chase Bank; Lead Teller of Operations; 04/2017 – 05/2019
- Full-Time Student; 08/2010 – 05/2019

##### *Educational Background:*

- Weber State University; Associate of Science Degree-General Studies; 2019
- 

#### Item 3 Disciplinary Information

A. Alexander Craner has never been involved in a criminal or civil action in a domestic, foreign or military court of competent jurisdiction for which he:

1. Was convicted of, or pled guilty or nolo contendere (“no contest”) to (a) any felony; (b) misdemeanor that involved investments or an investment-related business, fraud, false statement or omissions, wrongful taking of property, bribery, perjury, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;
2. Is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;
3. Was found to have been involved in a violation of an investment-related statute or regulation; or
4. Was the subject of any order, judgement or decree permanently or temporarily enjoining, or otherwise limiting, him from engaging in any investment related activity, or from violating any investment-related statute, rule, or order.

B. Alexander Craner never had an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which he:

1. Was found to have caused an investment-related business to lose its authorization to do business; or the subject of an order by the agency or authority;
2. Was found to have been involved in a violation of an investment-related statute or regulation or was the subject of an order by the agency or authority  
(a) denying, suspending or revoking the authorization of the supervised person to act in an investment-related business; (b) barring or suspending his association with an investment-related business; (c) otherwise significantly limiting his investment-related activities; or (d) imposing a civil money penalty of more than \$2,500 on him.

- C. Alexander Craner has never been the subject of a self-regulatory organization (SRO) proceeding in which he:
1. Was found to have caused an investment-related business to lose its authorization to do business; or
  2. Was found to have been involved in a violation of the SRO's rules and was: (a) barred or suspended from membership or from association with other members, or was expelled from membership; (b) otherwise significantly limited from investment-related activities; or (c) fined more than \$2,500.
- D. Alexander Craner has not been involved in any other hearing or formal adjudication in which a professional attainment, designation, or license of the supervised person was revoked or suspended because of a violation of rules relating to professional conduct.
- 

#### **Item 4 Other Business Activities**

Mr. Craner has a financial industry affiliated business as an insurance agent. From time to time, he may offer Clients advice or products from this activity.

This practice represents a conflict of interest because it gives Mr. Craner an incentive to recommend products based on the fee amount received. This conflict is mitigated by the fact that Mr. Craner has a fiduciary responsibility to place the best interest of the Client first and the Clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent, of their choosing.

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#### **Item 5 Additional Compensation**

Alexander Craner does receive additional compensation in his capacity as an insurance agent. He does not receive any performance-based fees.

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#### **Item 6 Supervision**

The firm has implemented a Code of Ethics and an internal compliance program that guides the firm and its personnel in complying with applicable state and federal securities laws and in meeting their fiduciary obligations to Clients. As an investment representative of the firm, Alexander Craner is responsible for monitoring Client portfolios for investment objectives and other account reviews. Alexander Craner is supervised by Mr. Ryan Craner, President of Strategic Planning Group. Mr. Craner can be reached at [rcraner@spgutah.com](mailto:rcraner@spgutah.com) or 801-627-2200.

Jeff Draper, the firm's Chief Compliance Officer is responsible for the implementation and supervision of the firm's Code of Ethics and compliance program. If you have questions or would like to receive a copy of the firm's Code of Ethics, Mr. Draper can be reached at [jeff@strategicutah.com](mailto:jeff@strategicutah.com) or 801-627-2200.

# PRIVACY POLICY NOTICE

Rev April 27, 2023



This notice is being provided to you in accordance with the Securities and Exchange Commission's rule regarding the privacy of consumer financial information ("Regulation S-P"). Please take the time to read and understand the privacy policies and procedures that we have implemented to safeguard your nonpublic personal information.

## INFORMATION WE COLLECT

Strategic Planning Group, LLC (Strategic Planning Group) must collect certain personally identifiable financial information about its customers to provide financial services and products. The personally identifiable financial information that we gather during the normal course of doing business with you may include:

- information we receive from you on applications or other forms;
- information about your transactions with us, our affiliates, or others;
- information we receive from a consumer reporting agency.

## INFORMATION WE DISCLOSE

We do not disclose any nonpublic personal information about our customers or former customers to anyone, except as permitted or required by law, or as necessary to provide services to you. In accordance with Section 248.13 of Regulation S-P, we may disclose all of the information we collect, as described above, to certain nonaffiliated third parties such as our attorneys, accountants, auditors, and persons or entities that are assessing our compliance with industry standards. We enter into contractual agreements with all nonaffiliated third parties that prohibit such third parties from disclosing or using the information other than to carry out the purposes for which we disclose the information.

## REGULATION S-ID

Regulation S-ID requires our firm to have an Identity Theft Protection Program (ITPP) that controls reasonably foreseeable risks to customers or the safety and soundness of our firm from identity theft. We have developed an ITTP to adequately identify and detect potential red flags to prevent and mitigate identity theft.

## CONFIDENTIALITY AND SECURITY

We restrict access to nonpublic personal information about you to those Employees who need to know that information to provide financial products or services to you. We maintain physical, electronic, and procedural safeguards that comply with federal standards to guard your nonpublic personal information.

## ACCURACY

Strategic Planning Group strives to maintain accurate personal information in our Client files at all times. However, as personal situations, facts, and data change over time; we encourage our Clients to provide feedback and updated information to help us meet our goals.

## CLOSED OR INACTIVE ACCOUNTS

If you decide to close your account(s) or become an inactive customer, our Privacy Policy will continue to apply to you.

## CHANGES TO THIS PRIVACY POLICY

If we make any substantial changes in the way we use or disseminate confidential information, we will notify you. If you have any questions concerning this Privacy Policy, please contact us at. 801-627-2200.