

Item 1: Cover Sheet



FORM ADV PART 2A INFORMATIONAL BROCHURE

ALERE PLANNING LLC
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William J. Weglein Jr.
410-252-0088

March 2024

This brochure provides information about the qualifications and business practices of Alere Planning LLC. If you have any questions about the contents of this brochure, please contact us at 410-252-0088. 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. Our registration does not imply a certain level of skill or training.

Additional information about Alere Planning LLC (CRD# 286121) is also available on the SEC's website at www.adviserinfo.sec.gov.

Item 2: Statement of Material Changes

Alere Planning LLC is required to disclose any material changes to this ADV Part 2A since filing its most recent annual amendment in March 2023. Alere Planning LLC has no material changes to report.

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

Item 3: Table of Contents

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INFORMATIONAL BROCHURE
ALERE PLANNING LLC

Item 4: Advisory Business

Alere Planning LLC (“Alere”) has been in business since February 2017. William J. Weglein Jr. is the firm’s only principal owner.

Alere provides personalized financial planning and investment management services to individuals, families, trusts, and charitable organizations and foundations, pensions, and corporations. We believe our experience provides a unique approach to managing our clients’ financial lives. Our goal is to provide clients with direction, clarity of thinking and a sense of confidence as they experience and/or prepare for life’s various transitions and surprises.

Potential clients are typically introduced as they face life transitions that are complex and emotional including retirement, career changes, loss of a loved one, family changes, inheritance, or even medical concerns that change their intended financial path. Change can be stressful; however, when managed effectively may lead to opportunity and growth. We believe our structured process helps clients better understand and embrace the strategies and actions necessary to meet their goals regardless of where they are in life.

Financial Planning

Alere’s planning process begins with a discovery meeting where time is taken to gather information, understand client expectations and determine the right fit for pursuing a working relationship. The planning process includes assessing a client’s overall financial well-being, collaboratively designing a financial life plan and implementing the agreed upon strategies and actions. Particular attention is paid to the client’s needs and comfort level with their current trajectory as well as potential changes or course corrections. The process continues with the development of a blueprint for a continued team effort to manage ongoing plan execution. The client may elect to have Alere manage their investments.

Asset Management

When we perform asset management services, we will do so on a discretionary basis. This means that while we will continue an ongoing relationship with each client, being involved in various stages of their lives and decisions to be made, but we will not seek specific approval of changes to client accounts. Because we take discretion when managing accounts, clients engaging us will be asked to execute a Limited Power of Attorney (granting us the discretionary authority over the client accounts) as well as an agreement that outlines the responsibilities of both the client and Alere. Advisory services are tailored to the specific needs of an individual client. Clients may place reasonable restrictions on the management of assets, including specific securities or types of securities. However, clients should understand that significant restrictions may decrease the ability of Alere to meet the client’s goals, and potentially increase the costs associated with managing the client’s portfolio.

In limited circumstances, we may provide asset management services on a non-discretionary basis, which means we will manage the clients’ accounts as we do for our discretionary clients, except we will consult with the client prior to implementing any investment recommendation. Clients should be aware that some recommendations may be time-sensitive, in which case recommendations not implemented because we are unable to reach a non-discretionary client may not be made on a timely

basis and therefore client's account may not perform as well as it would have had Alere been able to reach the client for a consultation on the recommendation.

SEI Managed Account Solutions

Alere has a small number of clients in the SEI Managed Account Solutions (MAS) Program. MAS is a wrap fee program available to Independent Advisors. Alere is no longer offering this Program to new clients, however clients currently in the MAS program with Alere are allowed to continue in the Program.

SEI Investments Management Corporation (SIMC) charges a bundled fee that includes advisory, brokerage and custody services. Clients invested in Distribution Focused Strategies are also charged a separate administrative fee that is not part of the bundled fee as explained in the fees section below in Item 5. SIMC sponsors and is advisor to MAS, which is made available to Alere who may allocate their clients' assets for investments into the programs. SIMC enters into a tri-party investment management agreement ("Managed Account Agreement") with Alere and its client which provides for the management of client assets allocated to MAS in accordance with the terms of the Managed Account Agreement. Pursuant to the Managed Account Agreement, the client appoints Alere as its investment advisor to assist the client in selecting an appropriate investment strategy and selecting available sub-advisors that have been assigned to the strategy by SIMC. The client appoints SIMC to manage the assets in each portfolio in accordance with the strategy recommended by Alere and selected by the Client.

Retirement Plan Consulting Services

The fiduciaries of self-directed retirement plans (which can include 401(k) plans) are required to, among other things, determine a selection of investments from which the plan's participants choose for their personal allocation in their individual participant account. Alere may provide assistance to plan sponsors in meeting this obligation through a consultative relationship including the selection of the plan investment options in accordance with the plan's objectives, as well as the ongoing monitoring of those options to assist the plan sponsor in determining when changes to these options are needed. This advice is rendered on a non-discretionary basis, meaning the plan sponsor is free to accept or reject Alere's recommendations. In addition, if requested by the plan sponsor, Alere may assist with the review of plan service providers.

Wrap Fee Programs

Alere offers advisory services through wrap fee and non-wrap fee programs. Whenever a fee is charged to a client for services described in this brochure, Alere will receive all or a portion of the fee charged. In the traditional non-wrap management programs, advisory services are provided for a fee, but transaction costs are billed separately on a per-transaction basis.

Assets Under Management

As of December 31, 2023, Alere Planning LLC has \$148,992,741 assets under management, in 422 accounts. Of these accounts, 421 accounts are managed on a discretionary basis, representing \$148,795,971 in assets under management, and 1 accounts, representing \$196,770 is managed on a non-discretionary basis.

Item 5: Fees and Compensation

A. Fees Charged

All investment management clients will be required to execute an Investment Management Agreement that will describe the type of management services to be provided and the fees, among other items. Clients are advised that they may pay fees that are higher or lower than fees they may pay another advisor for the same services. Clients are under no obligation at any time to engage or to continue to engage, Alere for investment services. If you do not receive a copy of this brochure at least 48 hours prior to the execution of an Agreement, you may terminate the agreement within the first five (5) business days without penalty.

Asset Management

Generally, fees vary from 0.65% to 1.25% per annum of the market value of a client's assets managed by Alere. The advisory fee is paid monthly, in advance, and calculated based on the net value of the account as of the last market day of the previous month.

Fees are negotiable, and the fee range stated is a guide. The fee chosen within that range is determined in part by the nature of the account, including the size of the account, complexity of asset structures, etc.

<i>Assets Under Management</i>	<i>Annual Rate</i>
Up to \$500,000	1.25%
\$500,001 to \$1,000,000	1.00%
\$1,000,001 to \$2,000,000	0.85%
\$2,000,001 to \$3,000,000	0.75%
\$3,000,001 +	0.65%

SEI Managed Account Solutions

As stated in Item 4, Alere has a small number of clients in the SEI Managed Account Solutions (MAS) Program. MAS is a wrap fee program available to Independent Advisors. Alere is no longer offering this Program to new clients, however clients currently in the MAS program with Alere are allowed to continue in the Program.

Alere charges an advisory fee in addition to, but separate from, the MAS fees from SEI. SIMC does not establish, review or approve those fees. The advisory fee is paid monthly, in arrears, and calculated based on the net value of the account as of the last market day of the previous month. Fees are negotiable, and the fee range shown above is a guide. The fee chosen within that range is determined in part by the nature of the account, including the size of the account, complexity of asset structures, etc.

In MAS, Clients pay a fee to SIMC for its advisory services, the trade execution provided by SIMC's affiliate SEI Investments Distribution Co. ("SIDCO") and the advisory services of Portfolio Managers. SIMC's fees are a percentage of the daily market value of the Client's Managed Account Portfolio assets. SIMC's fees are calculated and payable quarterly in arrears and net of any income, withholding or other taxes. SIMC will deduct fees directly from the Client's custody account.

If MAS is implemented using SEI Mutual Fund Models, Clients will pay the product fees for the funds in each model as specified in the funds' prospectus.

Clients participating in MAS must custody their assets at SEI Private Trust Company (“SPTC”) and therefore will be subject to custody fees charged by SPTC. The bundled wrap fee charged for participation in MAS includes these custody fees, with the exception of a termination fee that SPTC charges upon the termination of a Client’s account. SIMC and/or its affiliates may voluntarily waive certain custody fees for its Clients.

Financial Planning

In circumstances when financial planning is done on a stand-alone basis, the fees charged are based on the fee agreed upon by the adviser and client. The arrangement is typically provided on a fixed fee basis, and the fixed fees will generally range from \$1,000 to \$2,500. Financial planning fees are negotiable. These fees are dependent on the nature of the engagement and are decided upon on a case-by-case basis. At the discretion of Alere, financial planning services may be done on an hourly basis with a rate of \$250 per hour. In certain circumstances where ongoing financial planning and/or asset management services are provided to clients, at the discretion of the advisor, such services may be provided on a monthly fixed fee basis.

Retirement Plan Consulting Services

Generally, fees are 0.25% to 1.00% per annum of the market value of the plan’s assets under the direction of Alere. These are the only fees, either direct or indirect, that Alere reasonably expects to receive from the plan. Fees are negotiable, in the sole discretion of Alere. Additionally, at the discretion of Alere, the arrangement may be on a fixed fee basis. Retirement Plan Consulting fees are negotiable and are dependent on the nature of the engagement.

B. Fee Payment

Asset Management:

For clients whose assets are managed by the firm, investment advisory fees will be debited directly from each client’s account. The advisory fee is paid monthly, in advance, and the value used for the fee calculation is the net value as of the last market day of the previous month. For example, if your annual fee is 1.00%, each month we will multiply the value of your account by 1.00%, then divide by the number of days in that calendar year and multiply that number by days in the month to calculate our fee. To the extent there is cash in your account, it will be included in the value for the purpose of calculating fees only if the cash is part of an investment strategy. Once the calculation is made, we will instruct your account custodian via written notice to deduct the fee from your account and remit it to Alere. While almost all of our clients choose to have their fee debited from their account, we will invoice clients upon request.

Clients whose fees are directly debited will provide written authorization to debit advisory fees from their accounts held by a qualified custodian chosen by the client. Each month, the client will receive a statement from their account custodian showing all transactions in their account, including the fee.

Financial Planning: Financial planning fees will be due upon receipt of invoice from Alere.

Retirement Plan Consulting Services:

For plans whose assets are under the direction of Alere, fees may be debited directly from the plan or participant accounts or paid directly by the plan sponsor. The fee is paid quarterly, in advance, and the value used for the fee calculation is the market value of the plan's assets on the last day of the previous

billing month. Once the calculation is made, we will instruct the custodian to deduct the fee from your account and remit it to Alere.

In the case Retirement Plan Consulting Services are performed on a fixed fee basis, the fee is paid quarterly in advance.

C. Other Fees

There are a number of other fees that can be associated with holding and investing in securities. You will be responsible for fees including transaction fees for the purchase or sale of a mutual fund or Exchange Traded Fund, or commissions for the purchase or sale of a stock. Expenses of a fund will not be included in management fees, as they are deducted from the value of the shares by the mutual fund manager. For complete discussion of expenses related to each mutual fund, you should read a copy of the prospectus issued by that fund. Alere can provide or direct you to a copy of the prospectus for any fund that we recommend to you.

Please make sure to read Item 12 of this informational brochure, where we discuss broker-dealer and custodial issues.

D. *Pro-rata* Fees

If you become a client during a month, you will pay a management fee for the number of days left in that month. If you terminate our relationship during a month, you will be entitled to a refund of any management fees for the remainder of the month. Once your notice of termination is received, we will assess pro-rated fees for the number of days between the end of the prior billing period and the date of termination to be paid in whatever way you direct (check, wire).

E. Compensation for the Sale of Securities.

To permit Alere clients to have access to as many investment solutions as possible, certain professionals of Alere are registered representatives of Purshe Kaplan Sterling Investments, Inc. ("PKS"), a FINRA member broker-dealer. The relationship with PKS allows these professionals to provide additional products to clients' portfolios that would not otherwise be available. Because PKS supervises the activities of these professionals as registered representatives of PKS, the relationship may be deemed material. However, PKS is not affiliated with Alere or considered a related party. PKS does not make investment decisions for client accounts. Registered representative status enables these professionals to receive customary commissions for the sales of various securities, including those recommended to clients. Commissions charged for these products will not offset management fees owed to Alere.

Receipt of commissions for investment products that are recommended to clients gives rise to a conflict of interest for the representative, in that the individual who will receive the commissions is also the individual that is recommending that the client purchase a given product. This conflict is disclosed to clients verbally and in this brochure. Clients are advised that they may choose to implement any investment recommendation through another broker-dealer that is not affiliated with Alere. Alere attempts to mitigate this conflict by requiring that all investment recommendations have a sound basis for the recommendation, and by requiring employees to acknowledge their fiduciary responsibility toward each client.

Item 6: Performance-Based Fees

Alere will not charge performance-based fees.

Item 7: Types of Clients

Clients advised may include individuals, families, trusts, and charitable organizations and foundations, pensions and corporations. Alere requires each client to place at least \$150,000 with the firm. This minimum may be waived at the discretion of Alere.

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

It is important for you to know and remember that all investments carry risks. **Investing in securities involves risk of loss that clients should be prepared to bear.**

Each client's portfolio will be invested according to that client's investment objectives, which are ascertained through the financial planning process. The goal with asset management is to take the financial planning blueprint and drive it forward, towards the client's goals. Once we ascertain your objectives for each account, we will develop a set of asset allocation guidelines, and then in most cases place the assets in one of our investment strategies, each with a different asset allocation strategy. We utilize technical analyses, which means that we will review the past behaviors of the security and the markets in which it trades for signals as to what might happen in the future. Using fundamental analysis, we base our conclusions on predominantly publicly available research, such as regulatory filings, press releases, competitor analyses, and in some cases research we receive from our custodian or other market analyses.

The investment strategies are not investment products. Clients may have different needs than others within the same investment program. Although each investment program will have similar allocation percentages, not all clients will have the exact same percentages of each underlying investment.

The investment strategies that we recommend are based on the needs of the client as compared with the typical behavior of that security type or manager, current market conditions, the client's current financial situation, financial goals, and the timeline to meet those goals. Because we develop an investment strategy based on your personal situation and financial goals, your asset allocation guidelines may be similar to or different from another client. To ensure that each household is being managed as efficiently as possible, Alere has developed portfolios that are aimed to work in tandem with one another, through the use of multiple accounts. Due to the synergies between certain portfolios, clients may often be invested in more than one model, while still focusing on the target rate of return for the household.

We may periodically recommend changes to the investment strategies and client portfolios to meet the guidelines of the asset allocation for the program or an individual client's objectives. It is important to remember that because market conditions can vary greatly, your asset allocation guidelines are not necessarily strict rules. Rather, we review accounts individually, and may deviate from the guidelines as we believe necessary. We may utilize both active and passive portfolios depending on the client's objectives.

When Alere makes changes to an investment strategy, these changes may not be made simultaneously. Rather, some accounts may be modified before others. This may result in accounts being traded earlier

inadvertently having an advantage over accounts traded later.

The investment strategies utilized include:

Growth: This strategy will experience the greatest price volatility over shorter time periods (i.e. days, months or quarters). Its main goal is to provide investors with growth commensurate with the risk, and fluctuations are expected. The portfolios will emphasize global stocks, REITS, and MLPs.

Income: This strategy is best suited for investors who need income. The main goals are to provide income while expecting some volatility to maximize returns and keep up with inflation.

Core: This strategy will focus on investing in specific mutual funds and ETFs, with an emphasis on capital preservation.

Risk of Loss

There are always risks to investing. **Clients should be aware that all investments carry various types of risk including the potential loss of principal that clients should be prepared to bear.** It is impossible to name all possible types of risks. Among the risks are the following:

- **Political Risks.** Most investments have a global component, even domestic stocks. Political events anywhere in the world may have unforeseen consequences to markets around the world.
- **General Market Risks.** Markets can, as a whole, go up or down on various news releases or for no understandable reason at all. This sometimes means that the price of specific securities could go up or down without real reason, and may take some time to recover any lost value. Adding additional securities does not help to minimize this risk since all securities may be affected by market fluctuations.
- **Currency Risk.** When investing in another country using another currency, the changes in the value of the currency can change the value of your security value in your portfolio.
- **Regulatory Risk.** Changes in laws and regulations from any government can change the value of a given company and its accompanying securities. Certain industries are more susceptible to government regulation. Changes in zoning, tax structure or laws impact the return on these investments.
- **Tax Risks Related to Short Term Trading:** Clients should note that Alere may engage in short-term trading transactions. These transactions may result in short term gains or losses for federal and state tax purposes, which may be taxed at a higher rate than long term strategies. Alere endeavors to invest client assets in a tax efficient manner, but all clients are advised to consult with their tax professionals regarding the transactions in client accounts.
- **Purchasing Power Risk.** Purchasing power risk is the risk that your investment's value will decline as the price of goods rises (inflation). The investment's value itself does not decline, but its relative value does, which is the same thing. Inflation can happen for a variety of complex reasons, including a growing economy and a rising money supply.
- **Business Risk.** This can be thought of as certainty or uncertainty of income. Management comes under business risk. Cyclical companies (like automobile companies) have more business risk because of the less steady income stream. On the other hand, fast food chains tend to have steadier income streams and therefore, less business risk.
- **Financial Risk.** The amount of debt or leverage determines the financial risk of a company.

- **Default Risk.** This risk pertains to the ability of a company to service their debt. Ratings provided by several rating services help to identify those companies with more risk. Obligations of the U.S. government are said to be free of default risk.
- **Margin Risk.** “Margin” is a tool used to maximize returns on a given investment by using securities in a client account as collateral for a loan from the custodian to the client. The proceeds of that loan are then used to buy more securities. Margin carries a higher degree of risk than investing without margin.
- **Risks specific to private placements, sub-advisors and other managers.** If we invest some of your assets with another advisor, including a private placement, there are additional risks. These include risks that the other manager is not as qualified as we believe them to be, that the investments they use are not as liquid as we would normally use in your portfolio, or that their risk management guidelines are more liberal than we would normally employ.
- **Information Risk.** All investment professionals rely on research in order to make conclusions about investment options. This research is always a mix of both internal (proprietary) and external (provided by third parties) data and analyses. Even an adviser who says they rely solely on proprietary research must still collect data from third parties. This data, or outside research is chosen for its perceived reliability, but there is no guarantee that the data or research will be completely accurate. Failure in data accuracy or research will translate to a compromised ability by the adviser to reach satisfactory investment conclusions.
- **Small Companies.** Some investment opportunities in the marketplace involve smaller issuers. These companies may be starting up, or are historically small. While these companies sometimes have potential for outsized returns, they also have the potential for losses because the reasons the company is small are also risks to the company’s future. For example, a company’s management may lack experience, or the company’s capital for growth may be restricted. These small companies also tend to trade less frequently than larger companies, which can add to the risks associated with their securities because the ability to sell them at an appropriate price may be limited as compared to the markets as a whole. Not only do these companies have investment risk, if a client is invested in such small companies and requests immediate or short term liquidity, these securities may require a significant discount to value in order to be sold in a shorter time frame.
- **Concentration Risk.** While Alere selects individual securities, including mutual funds, for client portfolios based on an individualized assessment of each security, this evaluation comes without an overlay of general economic or sector specific issue analysis. This means that a client’s equity portfolio may be concentrated in a specific sector, geography, or sub-sector (among other types of potential concentrations), so that if an unexpected event occurs that affects that specific sector or geography, for example, the client’s equity portfolio may be affected negatively, including significant losses.
- **Transition risk.** As assets are transitioned from a client’s prior advisers to Alere there may be securities and other investments that do not fit within the asset allocation strategy selected for the client. Accordingly, these investments will need to be sold in order to reposition the portfolio into the asset allocation strategy selected by Alere. However, this transition process may take some time to accomplish. Some investments may not be unwound for a lengthy period of time for a variety of reasons that may include unwarranted low share prices, restrictions on trading, contractual restrictions on liquidity, or market-related liquidity concerns. In some cases, there may be securities or investments that are never able to be sold. The inability to transition a client's holdings into recommendations of Alere may adversely affect the client's account values, as Alere’s

recommendations may not be able to be fully implemented.

- **Restriction Risk.** Clients may at all times place reasonable restrictions on the management of their accounts. However, placing these restrictions may make managing the accounts more difficult, thus lowering the potential for returns.

- **Risks Related to Investment Term & Liquidity.** Securities do not follow a straight line up in value. All securities will have periods of time when the current price of the security is not an accurate measure of its value. If you require us to liquidate your portfolio during one of these periods, you will not realize as much value as you would have had the investment had the opportunity to regain its value. Further, some investments are made with the intention of the investment appreciating over an extended period of time. Liquidating these investments prior to their intended time horizon may result in losses.

- **REITs:** In limited circumstances, Alere may recommend that portions of client portfolios be allocated to real estate investment trusts, otherwise known as “REITs”. A REIT is an entity, typically a trust or corporation, that accepts investments from a number of investors, pools the money, and then uses that money to invest in real estate through either actual property purchases or mortgage loans. While there are some benefits to owning REITs, which include potential tax benefits, income and the relatively low barrier to invest in real estate as compared to directly investing in real estate, REITs also have some increased risks as compared to more traditional investments such as stocks, bonds, and mutual funds. First, real estate investing can be highly volatile. Second, the specific REIT chosen may have a focus such as commercial real estate or real estate in a given location. Such investment focus can be beneficial if the properties are successful, but lose significant principal if the properties are not successful. REITs may also employ significant leverage for the purpose of purchasing more investments with fewer investment dollars, which can enhance returns but also enhances the risk of loss. The success of a REIT is highly dependent upon the manager of the REIT. Clients should ensure they understand the role of the REIT in their portfolio.

- **MLPs:** Alere may recommend that portions of client portfolios be allocated to master limited partnerships, otherwise known as “MLPs”. An MLP is a publicly traded entity that is designed to provide tax benefits for the investor. In order to preserve these benefits, the MLP must derive most, if not all, of its income from real estate, natural resources and commodities. While MLPs may add diversification and tax favored treatment to a client’s portfolio, they also carry significant risks beyond more traditional investments such as stocks, bonds and mutual funds. One such risk is management risk-the success of the MLP is dependent upon the manager’s experience and judgment in selecting investments for the MLP. Another risk is the governance structure, which means the rules under which the entity is run. The investors are the limited partners of the MLP, with an affiliate of the manager typically the general partner. This means the manager has all of the control in running the entity, as opposed to an equity investment where shareholders vote on such matters as board composition. There is also a significant amount of risk with the underlying real estate, resources or commodities investments. Clients should ask Alere any questions regarding the role of MLPs in their portfolio.

- **International Investing:** Investing outside of the United States, especially in emerging markets, can have special or enhanced risks. The most obvious are political risk (changes in local politics can have a vast impact on the markets in that country as well as regulations affecting given issuers) and currency risk (changes in exchange rates between the dollar and the local denominations can materially affect the value of the security even if the underlying fundamentals and market price are stagnant). There are other risks, including enhanced liquidity risk, meaning that while domestic equities and mutual funds are generally easily liquidated (though there may be a risk of loss due to the timing of the sale), equities in other jurisdictions may be subject to the circumstances of lower overall market volume and fewer companies on an emerging exchange. In addition, there may be less information

and less transparency in a foreign market or from a foreign company. Foreign markets impose different rules than domestic markets, which may not be to an investor's advantage. Also, companies in foreign jurisdictions are generally able to avail themselves of local laws and venues, meaning that legal remedies for U.S. investors may not be as easily obtained as in the U.S.

- **BDCs (Business Development Companies):** Business Development Companies (BDCs) are a specific subset of investment companies that receive preferential tax treatment provided they meet certain investment restrictions and other regulatory requirements. Because BDCs are managed by third parties, and are frequently chosen for the perceived strength of their managers, the investment thesis, and tax treatment, the risks associated with a BDC investment generally follow directly from the manager, in that the manager ultimately controls the investments, and can adversely impact the tax treatment of the vehicle. Additional risks exist, and may be specific to the particular BDC. Accordingly, investors should carefully review the BDC's prospectus and any addendums thereto.

- **Excess Cash Balance Risk:** Client accounts may have cash balances in excess of \$250,000, which is the insurance limit of the Federal Deposit Insurance Corporation. For cash balances in excess of that amount, there is an enhanced risk that operation related counterparty risk related to the account custodian could cause losses in the account. We mitigate this risk by carrying cash balances in amounts either subject to protection or as limited as you, the client, directs. You may elect to participate in a "cash sweep" program through your account custodian which automatically moves excess cash from your investment account into a cash account and then invests that cash into cash based investments, such as money market funds. We do not receive compensation of any kinds for facilitating your participation in such cash sweep accounts.

- **Cryptocurrencies:** A cryptocurrency, crypto-currency, or crypto is a digital currency designed to work as a medium of exchange through a computer network that is not reliant on any central authority, such as a government or bank, to uphold or maintain it. Individual coin ownership records are stored in a digital ledger, which is a computerized database using cryptography to secure transaction records, to control the creation of additional coins, and to verify the transfer of coin ownership. Despite their name, cryptocurrencies are not necessarily considered to be currencies in the traditional sense and while varying categorical treatments have been applied to them, including classification as commodities, securities, as well as currencies, cryptocurrencies are generally viewed as a distinct asset class in practice. We view this emerging asset class as highly speculative with substantial risk of loss of principal. Coin prices relative to the U.S. dollar have a history of fluctuating significantly over time. Furthermore, there is significant regulatory risk as government entities clarify the legal and regulatory framework for this new technology. Database security (sometimes referred to as "digital wallets") is also a risk that can result in the theft of digital coins through global cybercrime networks.

Item 9: Disciplinary Information

There are no disciplinary items to report.

Item 10: Other Financial Industry Activities and Affiliations

A. Broker-dealer

To permit Alere clients to have access to as many investment solutions as possible, certain professionals of Alere are registered representatives of Purshe Kaplan Sterling Investments, Inc.

(“PKS”), a FINRA member broker-dealer. The relationship with PKS allows these professionals to provide additional products to clients’ portfolios that would not otherwise be available. Because PKS supervises the activities of these professionals as registered representatives of PKS, the relationship may be deemed material. However, PKS is not affiliated with Alere or considered a related party. PKS does not make investment decisions for client accounts. Registered representative status enables these professionals to receive customary commissions for the sales of various securities, including those recommended to clients. Commissions charged for these products will not offset management fees owed to Alere.

Receipt of commissions for investment products that are recommended to clients gives rise to a conflict of interest for the representative, in that the individual who will receive the commissions is also the individual that is recommending that the client purchase a given product. This conflict is disclosed to clients verbally and in this brochure. Clients are advised that they may choose to implement any investment recommendation through another broker-dealer that is not affiliated with Alere. Alere attempts to mitigate this conflict by requiring that all investment recommendations have a sound basis for the recommendation, and by requiring employees to acknowledge their fiduciary responsibility toward each client.

Certain professionals of Alere are separately licensed as independent insurance agents. As such, these professionals may conduct insurance product transactions for Alere clients, in their capacity as licensed insurance agents, and will receive customary commissions for these transactions in addition to any compensation received in his capacity as employees of Alere. Commissions from the sale of insurance products will not be used to offset or as a credit against advisory fees. These professionals therefore have incentive to recommend insurance products based on the compensation to be received, rather than on a client’s needs. The receipt of additional fees for insurance commissions is therefore a conflict of interest, and clients should be aware of this conflict when considering whether to engage Alere or utilize these professionals to implement any insurance recommendations. Alere attempts to mitigate this conflict of interest by disclosing the conflict to clients, and informing the clients that they are always free to purchase insurance products through other agents that are not affiliated with Alere, or to determine not to purchase the insurance product at all. Alere also attempts to mitigate the conflict of interest by requiring employees to acknowledge in the firm’s Code of Ethics, their individual fiduciary duty to the clients of Alere, which requires that employees put the interests of clients ahead of their own.

Financial Institution Marketing Program

Alere has established a marketing arrangement with UBANK, a Texas chartered bank, whereby investment advisory services of Alere will be marketed through UBANK, provided that such marketing is done in compliance with applicable SEC and state regulations. Further, Alere will have an investment adviser representative conducting business from UBANK locations. As a result, there is a conflict of interest when recommending Alere for advisory services. A prospective client referred to Alere by UBANK is under no obligation to utilize the investment advisory services of Alere. A prospective client referred by UBANK is urged to make his or her own independent investigation and evaluation of Alere.

B. Futures Commission Merchant/Commodity Trading Advisor

Neither the principal of Alere, nor any related persons are registered, or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity

trading advisor, or an associated person of the foregoing entities.

C. Relationship with Related Persons

To permit Alere clients to have access to as many investment solutions as possible, certain professionals of Alere are registered representatives of Purshe Kaplan Sterling Investments, Inc. ("PKS"), a FINRA member broker-dealer. The relationship with PKS allows these professionals to provide additional products to clients' portfolios that would not otherwise be available. Because PKS supervises the activities of these professionals as registered representatives of PKS, the relationship may be deemed material. However, PKS is not affiliated with Alere or considered a related party. PKS does not make investment decisions for client accounts. Registered representative status enables these professionals to receive customary commissions for the sales of various securities, including those recommended to clients. Commissions charged for these products will not offset management fees owed to Alere.

Receipt of commissions for investment products that are recommended to clients gives rise to a conflict of interest for the representative, in that the individual who will receive the commissions is also the individual that is recommending that the client purchase a given product. This conflict is disclosed to clients verbally and in this brochure. Clients are advised that they may choose to implement any investment recommendation through another broker-dealer that is not affiliated with Alere. Alere attempts to mitigate this conflict by requiring that all investment recommendations have a sound basis for the recommendation, and by requiring employees to acknowledge their fiduciary responsibility toward each client.

D. Recommendations of other Advisers

Alere does not utilize nor select other advisers or third-party managers at this time. All assets are managed by Alere.

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

- A. A copy of our Code of Ethics is available upon request. Our Code of Ethics includes discussions of our fiduciary duty to clients, political contributions, gifts, entertainment, and trading guidelines.
- B. Not applicable. Alere does not recommend to clients that they invest in any security in which Alere or any principal thereof has any financial interest.
- C. On occasion, an employee of Alere may purchase for his or her own account securities which are also recommended for clients. Our Code of Ethics details rules for employees regarding personal trading and avoiding conflicts of interest related to trading in one's own account. To avoid placing a trade before a client (in the case of a purchase) or after a client (in the case of a sale), all employee trades are reviewed by the Compliance Officer. All employee trades must either take place in the same block as a client trade or sufficiently apart in time from the client trade so the employee receives no added benefit. Employee statements are reviewed to confirm compliance with the trading procedures.
- D. On occasion, an employee of Alere may purchase for his or her own account securities which are also recommended for clients at the same time the clients purchase the securities. Our Code of

Ethics details rules for employees regarding personal trading and avoiding conflicts of interest related to trading in one's own account. To avoid placing a trade before a client (in the case of a purchase) or after a client (in the case of a sale), all employee trades are reviewed by the Compliance Officer. All employee trades must either take place in the same block as a client trade or sufficiently apart in time from the client trade so the employee receives no added benefit. Employee statements are reviewed to confirm compliance with the trading procedures.

Item 12: Brokerage Practices

A. Recommendation of Broker-Dealer

Alere does not maintain custody of client assets, though Alere may be deemed to have custody if a client grants Alere authority to debit fees directly from their account (see Item 15 below). Assets will be held with a qualified custodian, which is typically a bank or broker-dealer. Alere recommends that investment accounts be held in custody by Schwab Advisor Services ("Schwab") or SEI, each of which are qualified custodians. Alere is independently owned and operated and is not affiliated with Schwab nor SEI. Schwab or SEI will hold your assets in a brokerage account and buy and sell securities when Alere instructs them to, which Alere does in accordance with its agreement with you. While Alere recommends that you use Schwab or SEI as custodian/broker, you will decide whether to do so and will open your account with Schwab or SEI by entering into an account agreement directly with them. Alere does not open the account for you, although Alere may assist you in doing so. Even though your account is maintained at Schwab or SEI, we can still use other brokers to execute trades for your account as described below (see "Your brokerage and custody costs").

How we select brokers/custodians

We seek to recommend a custodian/broker that will hold your assets and execute transactions on terms that are, overall, most advantageous when compared with other available providers and their services. We consider a wide range of factors, including both quantitative (Ex: costs) and qualitative (execution, reputation, service) factors. We do not consider whether Schwab or any other broker-dealer/custodian, refers clients to Alere as part of our evaluation of these broker-dealers.

Your brokerage and custody costs

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. In addition to commissions, 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 have Schwab execute most trades for your account. 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").

Products and services available to us from Schwab

Schwab Advisor Services™ (formerly called Schwab Institutional®) is Schwab's business serving independent investment advisory firms like Alere. They provide Alere and our clients with access to

its institutional brokerage services (trading, custody, reporting, and related services), many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help Alere manage or administer our clients' accounts, while others help Alere 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 Alere. Following is a more detailed description of Schwab's support services:

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 may not directly benefit you.

Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts. They include investment research, both Schwab's own and that of third parties. We may 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, compliance, legal, and business needs
- Publications and conferences on practice management and business succession
- Access to employee benefits providers, human capital consultants, and insurance providers

Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. Schwab may also provide us with other benefits, such as occasional business entertainment of our personnel.

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. These services are not contingent upon us committing any specific amount of business to Schwab in trading commissions or assets in custody.

We may have an incentive to recommend that you maintain your account with Schwab, based on our interest in receiving Schwab's services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest. We believe, however, that our selection 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.

We do not consider whether Schwab or any other broker-dealer/custodian, refers clients to Alere as part of our evaluation of these broker-dealers.

B. Aggregating Trades

Commission costs per client may be lower on a particular trade if all clients in whose accounts the trade is to be made are executed at the same time. This is called aggregating trades. Instead of placing a number of trades for the same security for each account, we will, when appropriate, execute one trade for all accounts and then allocate the trades to each account after execution. If an aggregate trade is not fully executed, the securities will be allocated to client accounts on a *pro rata* basis, except where doing so would create an unintended adverse consequence (For example, if a *pro rata* division would result in a client receiving a fraction of a share, or a position in the account of less than 1%.)

Directed Brokerage

Alere allows clients to direct brokerage. "Directing" brokerage means choosing to maintain all or some of their assets with a broker-dealer that is not recommended by Alere. Alere may be unable to achieve most favorable execution of client transactions if clients choose to direct brokerage. This may cost clients' money because without the ability to direct brokerage Alere may not be able to aggregate orders to reduce transactions costs resulting in higher brokerage commissions and less favorable prices. Not all investment advisers allow their clients to direct brokerage.

Item 13: Review of Accounts

All accounts and corresponding financial plans will be managed on an ongoing basis, with formal reviews with the client by a member of senior management, specifically the managing member, on at least an annual basis. However, it is expected that market conditions, changes in a particular client's account, or changes to a client's circumstances will trigger a review of accounts.

The annual report in writing will include information related to portfolio performance. Clients will receive statements directly from their account custodian, as well as copies of all trade confirmations directly from their account custodian. Clients will also receive a bill itemizing the fees to be debited, including the formula used to calculate the fee, the amount of assets the fee is based, and the time period covered by the fee.

Item 14: Client Referrals and Other Compensation

A. Economic Benefit Provided by Third Parties for Advice Rendered to Client.

Please refer to Item 12, where we discuss recommendation of Broker-Dealers.

B. Compensation to Non-Advisory Personnel for Client Referrals.

Clients may be introduced to Alere via other third parties. If a client is introduced to Alere by either an unaffiliated or an affiliated solicitor, Alere may pay that solicitor a referral fee in accordance with the requirements of Rule 206(4)-1 of the Investment Advisers Act of 1940, and any corresponding state securities law requirements. Unaffiliated or affiliated solicitors will be licensed in accordance with applicable state laws. Any such referral fee shall be paid solely from Alere's investment management fee, and shall not result in any additional charge to the client. If the client is introduced to Alere by an unaffiliated solicitor, the solicitor, at the time of the solicitation, shall disclose the nature of the solicitor relationship, and shall provide each prospective client with a copy of Alere's ADV, and a copy of the written disclosure statement from the solicitor to the client disclosing the terms of the solicitation arrangement between Alere and the solicitor, including the compensation to be received by the solicitor from Alere.

Alere has established a marketing arrangement with UBANK, a Texas chartered bank, whereby Alere pays a referral fee to UBANK, which is a portion of the gross advisory fees collected by Alere with respect to transactions attributable to the operation of the Financial Institution Marketing Program. As a result, the employees of UBANK have a conflict of interest when recommending Alere for advisory services. A prospective client referred to Alere by UBANK is under no obligation to utilize the investment advisory services of Alere. A prospective client referred by UBANK is urged to make his or her own independent investigation and evaluation of Alere.

A client referred to Alere by UBANK should understand the following:

- 1) Alere is not a bank or any other type of financial depository institution.
- 2) With respect to the securities recommended or selected by Alere, such securities are not insured by the Federal Deposit Insurance Corporation (FDIC) or the National Credit Union Administration (NCUA); are not endorsed or guaranteed by the bank or credit union; and are subject to investment risks, including possible loss of principal invested.

Item 15: Custody

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

Clients whose fees are directly debited will provide written authorization to debit advisory fees from their accounts held by a qualified custodian chosen. Alere is deemed to have custody of client funds and securities whenever Alere is given the authority to have fees deducted directly from client accounts. Alere is also deemed to have custody of client funds and securities when Alere has standing authority (also known as a standing letter of authorization or "SLOA") to move money from a client's account to a third-party account. It should be noted that authorization to trade in client accounts is not deemed by regulators to be custody.

For accounts in which Alere is deemed to have custody, Alere has established procedures to ensure all client funds and securities are held at a qualified custodian in a separate account for each client under that client's name. Clients, or an independent representative of the client, will direct, in writing, the establishment of all accounts and therefore are aware of the qualified custodian's name, address and

the manner in which the funds or securities are maintained. Finally, account statements and trade confirmations are delivered directly from the qualified custodian to each client, or the client's independent representative, at least quarterly. Clients should carefully review those statements and are urged to compare the statements against reports received from Alere. When clients have questions about their account statements, they should contact Alere or the qualified custodian preparing the statement.

Each month, clients will receive a statement from their account custodian that contains all transaction information, dividend and interest activity and deposit/withdrawal activity in their account, including the advisory fee that was debited from their account, among other activity. Clients will also have access, through the online Morningstar Client Portal, to the client's Management Fee Statement which is a billing statement that itemizes the fee that was debited, including the formula used to calculate the fee, the amount of assets the fee is based, and the time period covered by the fee. The billing statement also discloses that the fee was not independently calculated by the custodian. Alere does not print or mail statements to clients.

Item 16: Investment Discretion

When Alere is engaged to provide asset management services on a discretionary basis, we will monitor your accounts to ensure that they are meeting your asset allocation requirements. If any changes are needed to your investments, we will make the changes. These changes may involve selling a security or group of investments and buying others or keeping the proceeds in cash. You may at any time place restrictions on the types of investments we may use on your behalf, or on the allocations to each security type. You may receive at your request written or electronic confirmations from your account custodian after any changes are made to your account. You will also receive monthly statements from your account custodian. Clients engaging us on a discretionary basis will be asked to execute a Limited Power of Attorney (granting us the discretionary authority over the client accounts) as well as an Investment Management Agreement that outlines the responsibilities of both the client and Alere.

Item 17: Voting Client Securities

Copies of our Proxy Voting Policies are available upon request.

From time to time, shareholders of stocks, mutual funds, exchange traded funds or other securities may be permitted to vote on various types of corporate actions. Examples of these actions include mergers, tender offers, or board elections. Clients are required to vote proxies related to their investments, or to choose not to vote their proxies. Alere will not accept authority to vote client securities. Clients will receive their proxies directly from the custodian for the client account. Alere will not give clients advice on how to vote proxies.

Item 18: Financial Information

Alere does not require the prepayment of fees more than six (6) months or more in advance and therefore has not provided a balance sheet with this brochure.

There are no material financial circumstances or conditions that would reasonably be expected to impair our ability to meet our contractual obligations to our clients.



FORM ADV PART 2B BROCHURE SUPPLEMENT

William J. Weglein Jr.

ALERE PLANNING LLC
110 West Road, Suite 415
Towson, MD 21204

6 Duck Ln.
Isle of Palms, SC 29451

410-252-0088

March 2024

This Brochure Supplement provides information about William J. Weglein Jr. that supplements the Alere Planning LLC Brochure. You should have received a copy of that Brochure. Please contact us at 410-252-0088 if you have any questions about the contents of this supplement. Registration does not imply any certain level of skill or training.

Additional information about William J. Weglein Jr. is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2: Educational Background and Business Experience

William J. Weglein Jr.

Born: 1962

CRD #4675284

EDUCATION:

B.S. in Mathematics, University of Maryland, 1985

M.A. in Business Administration with Finance Concentration, Loyola University Maryland, 1991

BUSINESS EXPERIENCE:

Alere Planning LLC

Principal Owner and Chief Compliance Officer, 02/2017 – Present

Purshe Kaplan Sterling Investments

Registered Representative, 02/2017 – Present

Mirus Planning Mid Atlantic LLC

Principal Owner, 09/2012 – 02/2017

Securities America, Inc.

Registered Representative, 09/2012 – 02/2017

Summit Financial Group

Financial Advisor, 02/2007 – 08/2012

LPL Financial

Registered Representative, 02/2007 – 08/2012

Item 3: Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item for Mr. Weglein.

Item 4: Other Business Activities

Mr. Weglein is a registered representative of Purshe Kaplan Sterling Investments, Inc. (“PKS”). Alere Planning LLC (“Alere”) is not affiliated with PKS other than as a registered representative. PKS is a registered broker-dealer and a FINRA member. Because PKS supervises the activities of these professionals as registered representatives of PKS, the relationship may be deemed material. However, PKS is not affiliated with Alere or considered a related party. PKS does not make investment decisions for client accounts. Registered representative status enables these professionals to receive customary commissions for the sales of various

securities, including those recommended to clients. Commissions charged for these products will not offset management fees owed to Alere.

Receipt of commissions for investment products that are recommended to clients gives rise to a conflict of interest for the representative, in that the individual who will receive the commissions is also the individual that is recommending that the client purchase a given product. This conflict is disclosed to clients verbally and in this brochure. Clients are advised that they may choose to implement any investment recommendation through another broker-dealer that is not affiliated with Alere. Alere attempts to mitigate this conflict by requiring that all investment recommendations have a sound basis for the recommendation, and by requiring employees to acknowledge their fiduciary responsibility toward each client.

Certain professionals of Alere are separately licensed as independent insurance agents. As such, these professionals may conduct insurance product transactions for Alere clients, in their capacity as licensed insurance agents, and will receive customary commissions for these transactions in addition to any compensation received in his capacity as employees of Alere. Commissions from the sale of insurance products will not be used to offset or as a credit against advisory fees. These professionals therefore have incentive to recommend insurance products based on the compensation to be received, rather than on a client's needs. The receipt of additional fees for insurance commissions is therefore a conflict of interest, and clients should be aware of this conflict when considering whether to engage Alere or utilize these professionals to implement any insurance recommendations. Alere attempts to mitigate this conflict of interest by disclosing the conflict to clients, and informing the clients that they are always free to purchase insurance products through other agents that are not affiliated with Alere, or to determine not to purchase the insurance product at all. Alere also attempts to mitigate the conflict of interest by requiring employees to acknowledge in the firm's Code of Ethics, their individual fiduciary duty to the clients of Alere, which requires that employees put the interests of clients ahead of their own.

Item 5: Additional Compensation

Please see response to Item 4, above.

Item 6: Supervision

Mr. Weglein is a principal of the firm, and also the firm's Chief Compliance Officer. He has no direct supervisor. However, all employees of Alere are required to follow the supervisory guidelines and procedures manual which is designed to ensure compliance with securities laws in the states where Alere is registered.



FORM ADV PART 2B BROCHURE SUPPLEMENT

Anthony Assadi

ALERE PLANNING LLC
110 West Road, Suite 415
Towson, MD 21204

6860 Dallas Parkway, Suite 110
Plano, TX 75024

410-252-0088

March 2024

This Brochure Supplement provides information about Anthony Assadi that supplements the Alere Planning LLC Brochure. You should have received a copy of that Brochure. Please contact us at 410-252-0088 if you have any questions about the contents of this supplement. Registration does not imply any certain level of skill or training.

Additional information about Anthony Assadi is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2: Educational Background and Business Experience

Anthony Assadi

Born: 1985

CRD #4834324

EDUCATION:

B.S. in Exercise Science, Towson University, 2007

MBA in Finance, University of Maryland, 2011

BUSINESS EXPERIENCE:

Alere Planning LLC

Investment Advisor Representative, 11/2017 – Present

NTT Data

Senior Manager, 09/2016 – 07/2019

DST Systems

Product Manager, 03/2012 – 06/2016

Equity Services Inc.

Registered Representative, 10/2008 – 03/2012

PROFESSIONAL DESIGNATIONS:

Chartered Financial Analyst

The Chartered Financial Analyst (CFA) designation is a globally respected, graduate-level investment credential established in 1962 and awarded by the CFA Institute, the largest global association of investment professionals.

To earn the CFA designation, candidates must (1) pass three sequential, six-hour examinations, (2) have at least four years of qualified professional investment experience, (3) join the CFA Institute as members, and (4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

High Ethical Standards - The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, requires CFA charterholders to:

- Place their clients' interests ahead of their own
- Maintain independence and objectivity
- Act with integrity

- Maintain and improve their professional competence
- Disclose conflicts of interest and legal matters

Global Recognition - Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study at each level). Earning the CFA charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision-making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA charterholders, often making the charter a prerequisite for employment.

Additionally, regulatory bodies in 19 countries recognize the CFA charter as a proxy for meeting certain licensing requirements. More than 125 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

Comprehensive and Current Knowledge - The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test proficiency in a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment management skills to reflect the dynamic and complex nature of the profession.

Certified Financial Planner (CFP®)

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;

- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

CFP Acknowledgment: Mr. Assadi acknowledges his responsibility as a CFP® Certificant to adhere to the standards that have been established in the CFP Board’s Standards of Professional Conduct. If you become aware that Mr. Assadi’s conduct may violate the Standards of Professional Conduct, you may file a complaint with the CFP Board at www.CFP.net/complaint.

Item 3: Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item for Mr. Assadi.

Item 4: Other Business Activities

Certain professionals of Alere are separately licensed as independent insurance agents. As such, these professionals may conduct insurance product transactions for Alere clients, in their capacity as licensed insurance agents, and will receive customary commissions for these transactions in addition to any compensation received in his capacity as employees of Alere. Commissions from the sale of insurance products will not be used to offset or as a credit against advisory fees. These professionals therefore have incentive to recommend insurance products based on the compensation to be received, rather than on a client’s needs. The receipt of additional fees for insurance commissions is therefore a conflict of interest, and clients should be aware of this conflict when considering whether to engage Alere or utilize these professionals to implement any insurance recommendations. Alere attempts to mitigate this conflict of interest by disclosing the conflict to clients, and informing the clients that they are always free to purchase insurance products through other agents that are not affiliated with Alere, or to determine not to purchase the insurance product at all. Alere also attempts to mitigate the conflict of interest by requiring employees to acknowledge in the firm’s Code of Ethics, their individual fiduciary duty to the clients of Alere, which requires that employees put the interests of clients ahead of their own.

Item 5: Additional Compensation

Other than salary, annual bonuses, or regular bonuses, Mr. Assadi does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through Alere.

Item 6: Supervision

Mr. Assadi is supervised by the firm's Chief Compliance Officer, William J. Weglein Jr. Additionally, all employees of Alere are required to follow the supervisory guidelines and procedures manual which is designed to ensure compliance with securities laws in the states where Alere is registered.

Alere Planning LLC
Privacy Notice

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

Alere Planning must collect certain personally identifiable financial information about its clients to ensure that it offers the highest quality financial services and products. The personally identifiable financial information which we gather during the normal course of doing business with you may include:

1. information we receive from you on applications or other forms;
2. information about your transactions with us, our affiliates, or others;
3. information collected through an Internet "cookie" (an information collecting device from a web server); and
4. information we receive from a consumer reporting agency.

INFORMATION WE DISCLOSE

We do not disclose any nonpublic personal information about our clients or former clients to anyone, except as permitted by law. We do not disclose your personal information to any third party for the purpose of allowing that party to market other products 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 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.

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.