



## 1. Introduction: Who is Compound Planning?

Atomi Financial Group, Inc. D/B/A Compound Planning (the “Firm,” “us,” or “we”), is a SEC-registered investment adviser. We feel it is important for you to understand how advisory and brokerage services and fees differ in order to determine which type of account is right for you.

There are free and simple tools available to research firms and financial professionals at <http://www.investor.gov/CRS> which also provides educational materials about investment advisers, broker-dealers and investing.

## 2. What investment services and advice can you provide me?

Compound Planning offers turnkey asset management platform (TAMP) services to financial intermediaries including unaffiliated broker-dealers, unaffiliated registered investment advisers, and affiliated investment adviser representatives (“IARs”) (collectively, “Financial Intermediary” or “Intermediary”) serving as a sub-adviser to the Financial Intermediary. Compound Planning, through its affiliated IARs, also provides investment advisory services to individuals or retail clients through its TAMP. These TAMP services include:

- a. In-House Models.** Compound Planning manages different liquid asset allocation models, each designed to meet a specific investment goal. We use a number of analytical tools in developing its asset allocation strategies.
- b. Third-Party Models.** We maintain a platform where third-party managers provide investment strategies and models (“Models”) and make them available to Financial Intermediaries for selection on behalf of their clients in accordance with their clients’ needs, objectives, risk profile, and other financial considerations.
- c. Intermediary-Directed Models.** Compound Planning also offers Financial Intermediaries the ability to create and manage their own investment portfolios for clients. For clients using an Intermediary-Directed Model, we would not be providing any investment advisory services but only administrative services.
- d. Alternative Investments.** Compound Planning makes investment managers of non-traditional, private, or unregistered investment strategies (collectively, “Alternative Investments”)

accessible to Financial Intermediaries for use with their clients. Some Alternative Investments will require the client to enter into a separate client agreement, via a subscription agreement with the Alternative Investment manager, which will contain separate fees, terms and conditions, and disclosures.

- e. Back-Office Services.** Compound Planning provides certain back-office functions such as account reconciliation, reporting and billing.
- f. Software Licensing and Consulting Services.** Compound Planning may license its asset management software program, which is provided through a web-enabled platform (“Platform”), to other Financial Intermediaries. Compound Planning may also provide consulting services in relation to its software licensing, including implementation support and ongoing maintenance services.

When Compound Planning offers TAMP services to unaffiliated Financial Intermediaries, it does not directly transact with the end-client and the advisory services may be limited to assisting the Financial Intermediary with investment policy statement determination, asset allocation, investment selection, portfolio management, billing, and client reporting. These investment advisory services are generally provided on a limited discretionary basis. Compound Planning, however, may also offer investment advisory services on a non-discretionary basis wherein the client makes the ultimate decision regarding the purchase or sale of investments.

When Compound Planning offers advisory services to individuals or retail clients through its affiliated IARs, the Firm takes on a fiduciary duty when determining the appropriateness of any investment recommendations and serves its clients on a discretionary basis, that is, the Firm executes securities transactions for clients without having to obtain specific client consent prior to each transaction.

As a part of its advisory services, Compound Planning periodically monitors the investments of its clients which may include retail investors.

Compound Planning also offers financial planning services to help clients have a better understanding of: (a) their current financial situation, (b) goals, needs, and risks, and (c) the



potential consequences of taking (or not taking) certain actions. For financial planning services, we consult on issues including retirement planning, education funding, tax planning, tax preparation, charitable giving, business succession, risk management, estate planning, and financial aspects of divorce. You retain absolute discretion over all implementation decisions and are under no obligation to act upon any of our recommendations; the ultimate decision regarding the purchase or sale of financial products lies with you.

Compound Planning also offers clients consulting services that may vary widely in nature, are out of scope of investment management services or financial planning services and are billed separately. Examples of such consulting services include, but are not limited to researching different tax strategies, tax filing solutions, assisting with estate transfer or probate matters, serving as trustee, bill pay and other family office services, providing expertise on business growth matters, etc. In these types of services, the Firm does not and will not supervise, manage and direct any client assets (including cash), and will neither purchase, sell, invest, reinvest, exchange, convert, nor trade any assets or securities.

We do not limit our investment advice and recommendations with respect to proprietary products, or to a limited menu of products or types of investments. We also do not impose a strict asset minimum to open an account with us; however, it may be impractical for clients with less than \$25,000 under management.

For further information about our advisory services please read Items 4, 7, and 8 of our Form ADV Part 2A disclosure brochure.

**Conversation Starters.** Additional questions to ask about Compound Planning and/or its services.

- Given my financial situation, should I choose an investment advisory service? Why or why not?
- How will you choose investments to recommend to me?
- What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?

### 3. What fees will I pay?

Fees and costs for investment advisory services affect the value of your account over time. Please ask your adviser to give you personalized information on the fees and costs that you will pay.

For our TAMP services, it will depend on the services utilized by the Financial Intermediary. The schedule of fees for TAMP services are as follows:

SERVICE	FEE RATE / RANGE
<b>TAMP Platform</b>	25 bps (0.25%) of the AUM or \$60.00 per year, whichever is higher
<b>In-House Models</b>	15 bps of the AUM per year (0.15%)
<b>Third-Party Models</b>	0 bps to 300 bps (0-3.0%) of the AUM per year
<b>Intermediary as Portfolio Manager</b>	5 bps (0.05%) of the AUM per year
<b>Alternative Investment Strategies</b>	35 bps (0.35%) of the AUM per year

For individual or retail clients of Compound Planning's affiliated IARs, an additional advisory fee is charged on top of the TAMP fees mentioned above. However, your affiliated IAR may choose to absorb the TAMP fee rather than passing the cost on to you, the client.

Because our fees are usually based on a percentage of your assets, we have an incentive to encourage you to increase the assets in your account. Our fee does not include the fee charged by your Financial Intermediary (e.g., your investment adviser), but we often perform the fee billing service on your Financial Intermediary's behalf. Our fees are charged on a regular billing cycle (monthly, quarterly, etc.) in advance or arrears. The standard and most common billing arrangement for new clients is for the fees to be billed quarterly in advance based on the average daily balance of the account, with the initial bill including a prorated fee calculated in arrears for the past quarter based on the average daily balance of the client's account since it was opened.



Your advisor may charge additional fees relating to Financial Planning or Consulting Services. Depending on the nature of services, fees may be assessed one-time or as an ongoing retainer fee. The scope of services and associated fees are disclosed in either our Financial Planning Agreement or our Consulting Services Agreement. Clients may terminate any ongoing services at any time via written notice.

Clients may also have the opportunity to access illiquid investments through a third-party intermediary. In such cases, there may be additional fees charged by the third-party intermediary for facilitating access to and managing those illiquid investments. Clients should likewise carefully review and understand any additional fees associated with illiquid investments accessed through third-party intermediaries before investing in such products.

Our fees are negotiable. Fees will be automatically deducted from your account unless you have provided authorization to use an alternative method of payment. You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments overtime. Please make sure you understand what fees and costs you are paying.

The custodian that holds your assets may charge you a transaction fee when we buy or sell an investment for you. You may also pay charges imposed by the custodian holding your accounts for maintaining your account. The custodian's fees are in addition to our advisory fees. Some investments, such as mutual funds, exchange-traded funds, and DPIs charge additional fees that will reduce the value of your investments over time. Additional information about our fees can be found in Item 5 of our Form ADV Part 2A disclosure brochure.

**Conversation Starters.** Additional questions to ask about Compound Planning and/or its services.

Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?

**a. What are your legal obligations to me when acting as my investment adviser? How else does**

**your firm make money and what conflicts of interest do you have?**

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means:

- Compound Planning generally recommends either Fidelity or Schwab Institutional to serve as your custodian. These custodians provide us with certain products and services at no cost, which benefit us but do not directly benefit our clients. These products and services assist us in managing and administering our clients' accounts. The receipt of such benefits creates a conflict of interest as it gives us an incentive to have clients custody their assets with one of these custodians.
- Compound Planning's IARs would also mainly use and recommend the Firm's TAMP services. There is a conflict of interest here as the IARs are incentivized by the additional fees that the Firm will get for the TAMP services aside from the main advisory fee.
- Compound Planning may also offer financial planning services or products of its affiliates or associated person or those for which it will receive compensation. There is a conflict of interest here due to the fees that the Firm or its affiliated or associated persons would earn.

More detailed information about our conflicts of interest can be found in Items 4, 10, 11, 12, and 14 of our Form ADV Part 2A disclosure brochure.

**Conversation Starters.** Additional questions to ask about Compound Planning and/or its services.

How might your conflicts of interest affect me, and how will you address them?

**b. How do your financial professionals make money?**

Our financial professionals (e.g., our IARs) receive



compensation based on a percentage of the revenue they generate for the Firm. This means that an IAR's earnings are directly tied to the amount of fees charged to their clients. To address potential conflicts, we disclose this fact to you and we have structured compensation for our IARs in such a way that their compensation for advisory-related business is the same regardless of the underlying investments recommended. In other words, our IARs are not financially incentivized to recommend one investment over another. Additionally, our Firm does not promote or participate in any sales-related contests or bonus payouts.

Certain financial professionals of the Firm are licensed insurance agents appointed with various insurance agencies. These financial professionals receive commissions when clients purchase insurance products. This creates a conflict of interest. To address this conflict, we disclose this fact plus inform clients are not required to accept any recommendation.

Additional information about the compensation received by Compound Planning professionals and any related conflicts of interest are outlined in each professional's Form ADV Part 2B disclosure brochure.

#### 4. Do you or your financial professionals have legal or disciplinary history?

No, for the Firm. Yes, for some of our IARs. Additional information about an IAR's disciplinary history is available in their Form ADV Part 2B brochure which can be obtained by contacting us, or in the SEC Investment Adviser Public Disclosure (IARD) website at <https://adviserinfo.sec.gov/>.

You can also visit <http://www.investor.gov/CRS> for a free and simple search tool to research our Firm and our financial professionals.

**Conversation Starters.** Additional questions to ask about Compound Planning and/or its services.

As a financial professional, do you have any disciplinary history? For what type of conduct?

#### 5. Additional Information

You can find additional information about our Firm's advisory services, including a copy of our Form ADV

Part 2A disclosure brochure, at <http://www.adviserinfo.sec.gov> by clicking on the "FIRM" tab and then searching CRD #171787. If you would like to additional information or a copy of this disclosure, please call us at (888) 533-9364.

**Conversation Starters.** Additional questions to ask about Compound Planning and/or its services.

Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?

#### 6. Material Changes and Updates

As of April 9, 2024, there are no other notable changes and updates regarding the Firm or its services in addition to those already disclosed in its Form ADV, Part 2A brochure.