

**Pivotal Planning Group, LLC
125 Jericho Turnpike
Suite 200
Jericho, New York 11753**

**Phone: 516-333-6565
Fax: 516-338-8862
Web Site: www.pivotalplanning.com**

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FORM ADV PART 2A. BROCHURE

This brochure provides information about the qualifications and business practices of Pivotal Planning Group, LLC. If you have any questions about the contents of this brochure, please contact us at 516-333-6565. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Pivotal Planning Group, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Pivotal Planning Group, LLC is 126575.

Pivotal Planning Group, LLC is a Registered Investment Adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

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Advisory Business

Form ADV Part 2A, Item 4

Pivotal Planning Group, LLC's registration was granted by the U.S. Securities and Exchange Commission on April 16, 2010. Roger T. Ciacco (CRD Number 4685314) is a five (5%) percent equity owner of the firm and Co-Managing Member. Satty, Levine & Ciacco, CPAs, P.C. (EIN 11-2370855) is a member and fifty-five (55%) percent equity owner of the firm. Larry Marchisotta (CRD Number 5120199) is an active member and five (5%) percent equity owner of the firm. John Marchisotta (CRD Number 2805490) is a twenty-five (25%) percent equity owner of the firm, Co-Managing Member and Chief Compliance Officer. Frank W. Sluter (CRD Number 51120214) is a passive member and five (5%) percent minority equity owner of the firm. Robert E. Bertucelli (CRD Number 5788213) is a passive member and five (5%) percent minority equity owner of the firm. The firm is not publicly owned or traded. The firm manages each client's portfolio on an individualized basis. Clients may impose restrictions. The firm does not sponsor any wrap program. As of March 5, 2012, Pivotal Planning Group, LLC managed approximately \$92,687,663 in assets for about 269 accounts or approximately 118 client households. The Firm managed assets on a discretionary basis in the amount of \$88,368,816 which represented 263 accounts and managed on a nondiscretionary basis \$4,318,847 which represented 6 accounts.

As discussed below in this disclosure document, the firm provides its clients (that is individuals, pension and profit-sharing plans, trusts, charitable organizations and business entities) financial planning and investment management services.

Financial Planning:

To the extent requested by the client, the firm may provide its clients with a broad range of comprehensive financial planning and consulting services including investment and non-investment related matters. The firm will charge a fee (fixed and/or hourly) for the services. Prior to engaging the firm to provide financial planning and/or consulting services, the client will be required to enter into a financial planning agreement with the firm, setting forth the terms and conditions of the engagement, describing the scope of the services to be provided, and the portion of the fee that is due from the client prior to the firm commencing services. In performing its services, the firm shall not be required to verify any information received from the client or from the client's other professionals, and is expressly authorized to rely thereupon. If requested by the client, the firm may recommend the services of other professionals for implementation purposes. The client is under no obligation to engage the services of any such recommended professional. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from the firm. Moreover, each client is advised that it remains his/ her/ its responsibility to promptly notify the firm if there is ever any change in his/her/its financial situation or investment objectives for the purpose of reviewing/evaluating/ revising the firm's previous recommendations and/or services.

Miscellaneous Consulting Services

In addition, for those clients who require an enhanced and or specialized level of asset management service, the firm shall also recommend that the client allocate his/her/its assets among other investment advisers (The "Independent Managers"), to be recommended by the firm, based upon the stated investment objectives of the client. The terms and conditions under which the client shall engage the independent manager shall be set forth in a separate written agreement between the client and the designated independent manager. Upon engagement of the independent manager by the client, the firm shall render periodic advisory services to the client limited solely to the monitoring and review of independent manager's performance. Factors which the firm shall consider in recommending independent managers include the client's stated investment objectives, management style, performance, reputation, financial strength, reporting, pricing, and research.

If the firm refers a client to independent manager, and the client engages the independent manager, the firm shall be compensated for service by receipt of a referral fee to be paid by independent manager to the firm in accordance with the requirements of SEC rules. Any such referral fee shall be paid forward from the independent manager's, investment management fee, and shall not result in any additional charge to the client. In addition to the firm's disclosure statement, as set forth in this Form ADV Part 2 "Brochure" narrative, the client shall also receive the written disclosure statement of the recommended investment manager.

Investment Management:

The firm offers clients investment management services on a fee-only basis.

Prior to engaging the firm to provide investment management services, the client will be required to enter into a formal investment advisory agreement with the firm, setting forth the terms and conditions under which the firm shall manage the client's assets, and a separate custodial/clearing agreement with each designated broker/dealer/custodian. Both the firm's investment advisory agreement and the custodial/clearing agreement shall authorize the custodian to debit the account from the amount of the firm's investment management fee, and to directly remit that management fee to the firm in accordance with required SEC procedures. The investment advisory agreement between the firm and the client will continue in effect until terminated by either party by written notice in accordance with the terms of the investment advisory agreement. Upon termination, the firm shall refund to the client the pro-rated remaining balance, if any, of the firm's quarterly investment management fee.

The firm allocates investment management assets of its client accounts on a discretionary basis. Unless the client directs, where the circumstances presented require otherwise, the firm shall generally recommend that SEI Private Trust Co. (SPTC) serve as the broker/dealer/custodian for client assets. SPTC may charge commissions and or transaction fees for effecting certain securities transactions (i.e., transaction fees are charged for certain no load mutual funds, commissions are charged for individual equity/debt securities transactions). In addition to the firm's investment management fee, brokerage commissions and or transaction fees, the client will also incur, relative to all mutual fund purchases, charges imposed at the mutual fund level (i.e., management fees and other fund expenses). When beneficial to the client, transactions may be effected through broker/dealers with whom the firm and or the client have entered into arrangements for prime brokerage clearing services.

The firm may also provide non-discretionary services to certain of its qualified clients relative to certain investments and private placement limited partnerships offered in accordance with Regulation D. The firm's services, in this regard, are limited to advice only, and the firm does not nor do its members participate in any such partnerships as a sponsor, promoter or salesperson.

Investment managers

In addition, for those clients that require an enhanced and/or specialized level of investment management service, the firm shall also recommend that certain clients authorize the firm to allocate, on a discretionary basis, the active discretionary management of a portion of their assets by and/or among certain independent investment managers to be selected by the firm based upon the stated objectives of the client. The firm shall continue to render ongoing and continuous advisory services to the client relative to the monitoring and review of account performance, client investment objectives, and asset allocation, for which the firm shall receive an annual advisory fee, which is based upon a percentage of the market value of the assets being managed by the designated independent manager in accordance with the above set forth fee schedule. Factors which the firm shall consider in recommending independent managers shall include the client's stated investment objectives, management style, performance, reputation, financial strength, reporting, pricing and research. The firm generally has the authority to determine the broker/dealer/custodian to be used by the designated independent

manager relative to those accounts for which the independent manager may provide investment management services on a discretionary basis for the firm's clients. The investment management fees charged by the designated independent manager, together with the fees charged by the corresponding designated broker/dealer/custodian of the client's assets, are exclusive of and in addition to the firm's ongoing investment advisory fee.

In performing its services, the firm shall not be required to verify any information received from the client or from the client's other professionals (i.e. attorney, insurance agent, accountant, etc.), and is expressly authorized to rely thereupon. If requested by the client, the firm shall recommend the services of other professionals for financial planning implementation purposes. The client is under no obligation to engage in services of any such recommended professional. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any financial planning recommendation from the firm. Clients are advised that it is their responsibility to notify the firm if there is ever any change in his/her/its financial situation or investment objectives for the purpose of reviewing or evaluating or revising the firm's previous recommendation and/or services or if they wish to impose reasonable restrictions upon the firm's management services.

Neither the firm nor the client may assign the financial planning agreement and/or the investment advisory agreement without the prior written consent of the other party. Transactions that do not result in a change of actual control or management of the firm shall not be considered an assignment. A copy of the firm's disclosure statement as set forth in this Form ADV, Part 2 "Brochure" narrative shall be provided to each client prior to or contemporaneously with the execution of the financial planning agreement or investment advisory agreement. Any client who has not received a copy of the firm's written disclosure statement at least 48 hours prior to executing the financial planning agreement or investment advisory agreement shall have five business days subsequent to having signed the agreement, to terminate the firm's services without penalty.

Fees and Compensation

Form ADV Part 2A, Item 5

The firm will charge a fee (fixed and/or hourly) for the services. The firm's financial planning fees are negotiable, but generally range from \$1,000 to \$10,000 on a fixed fee basis and from \$100 to \$300 on an hourly rate basis, depending upon the level and scope of the services required. The firm charges 50% upfront and the remainder balance upon completion of the client's financial plan based upon the size of the client, complexity of the engagement, and negotiations with the client.

The firm shall charge an annual investment management fee based upon a percentage of the market value of the assets being managed by the firm. The investment management fee charged varies between negotiable and 1.50%, depending upon the market value of assets under management as follows:

Assets Under Management	Annual Fee
\$0 to \$250,000	1.50%
\$250,001 to \$500,000	1.25%
\$500,000 to \$1,000,000	1.00%
\$1,000,001 to \$5,000,000	0.75%
\$5,000,001 to \$25,000,000	0.50%

The firm's quarterly client fees are charged at the end of every quarter in arrears. When required, refunds are reimbursed to the client based on a pro rata share of a 90-day quarter.

Firm's annual investment management fee shall be prorated and paid for quarterly in arrears based upon the market value of the assets on March 31st (for the quarter ending March 31), June 30th (for the quarter ending June 30), September 30th (for the quarter ending September 30th) and December 31st (for the quarter ending December 31) of each calendar year. No increase in the annual fee shall be effective without prior written notification to the client. Firm generally does not require an account minimum for investment management services. The firm, at its sole discretion, may charge a lesser management fee based upon certain criteria (i.e., existing financial planning clients, anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related account, account composition, negotiations with client, etc.).

To the extent that the client requires that the firm recommend a broker/dealer/custodian for execution and or custodial services (exclusive of those clients that direct the firm to use specific broker/dealer/custodian), the firm generally recommends that investment management accounts be maintained at various broker/dealers and or custodians, including, but not limited to SEI Private Trust Company (SPTC). In connection with certain products or services, notably mutual fund transactions, the firm may use other registered broker/dealers as custodians, such as TD Ameritrade, First Mercantile Trust and or Charles Schwab and Company.

Performance-Based Fees and Side-By-Side Management

Form ADV Part 2A, Item 6

None.

Types of Clients

Form ADV Part 2A, Item 7

Individuals, pension and profit-sharing plans, trusts, charitable organizations and business entities

Methods of Analysis, Investment Strategies and Risk of Loss

Form ADV Part 2A, Item 8

The utilized method of securities analysis is fundamental analysis. When using Fundamental Analysis, we generally rely on, among other things, company earnings, balance sheet variables and management quality which are used to predict the future value of an investment. Data we review is generally considered reliable but we cannot guarantee nor have we verified its accuracy. In addition, the data that we review is sometimes subjective in nature and open to interpretation. Even if our data and interpretation of the data is correct, there may be other factors that determine the value of securities other than those considered in Fundamental Analysis. Technical analysis and cyclical analysis is also used.

The investment strategy employed is long term purchases which are securities held at least a year.

Investing in securities involves risk of loss that you should be prepared to bear.

Disciplinary Information

Form ADV Part 2A, Item 9

None.

Other Financial Industry Activities and Affiliations

Form ADV Part 2A, Item 10

The members of the firm are also the members of Satty, Levine, and Ciacco, CPAs, P.C., a certified public accounting firm, ("SL&C") and Pivotal Insurance Agency, a licensed insurance agency, ("PIA"). To the extent that SL&C provides accounting and/or tax preparation services to any clients, including clients of this firm, all such services shall be performed by SL&C in a professional capacity through that firm and independently of this firm. This firm shall not receive any portion of the fees charged by SL&C, referral or otherwise.

Although SL&C and PIA shall not receive referral fees, SL&C and PIA shall be entitled to receive distributions relative to their respective ownership interests. Neither SL&C nor PIA is involved in providing investment advice on behalf of such firms, nor does SL&C or PIA hold themselves out as providing advisory services.

The firm does not render accounting advice, tax preparation services or insurance advice to its clients. Rather, to the extent that the client requires accounting advice, tax preparation services or insurance advice and/or products, the firm, if requested, will recommend the services of a certified public accountant or a licensed insurance agent, as applicable, all of which services shall be rendered independent of the firm. The firm shall not receive any of the fees charged by any recommended professional referral or otherwise. The firm provides its clients with financial planning and consultation services, a portion of which does not involve the rendering of investment advice. Additionally, the firm generally recommends that SEI Private Trust Company, First Mercantile Trust Co., TD Ameritrade, Schwab and/or Fidelity serve as the broker/dealer/custodian for client accounts.

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

Form ADV Part 2A, Item 11

Firm has adopted a written Code of Ethics in compliance with SEC rule 204A-1. The code sets forth standards of conduct and requires compliance with federal and state securities laws. Our code also addresses personal securities trading and requires our personnel to report their personal securities holdings and transactions. We will provide a copy of our Code of Ethics to any client or prospective client upon request.

Firm may own, purchase or sell same or similar securities as those of the Client. This is disclosed prior to the signing of the Financial Advisory and/or Investment Management Agreement. In addition, Client uses best efforts to make sure that the terms of the Client's transactions involving such securities are at least as favorable as those which the Firm participates in. In the unlikely event that the interests of the Firm's account would happen to correspond with an advisory client's interests, full disclosure would be made to such client at once. Records will be maintained of all securities bought or sold by the Firm, and will be available for Client inspection upon request should it be determined by Firm that any potential conflict of interest may exist.

It is the express policy of Firm that no person employed by Firm may purchase or sell any security prior to a transaction(s) being implemented for an advisory account, and therefore, preventing such employees from benefiting from transactions placed on behalf of advisory accounts.

As these situations may represent a conflict of interest, Firm has established the following restrictions in order to ensure its fiduciary responsibilities:

- 1) A director, officer or employee of Firm shall not buy or sell securities for their personal portfolio(s) where their decision is substantially derived, in whole or in part, by reason of his or her employment unless the information is also available to the investing public on reasonable inquiry. No person of Firm shall prefer his or her own interest to that of the advisory client.
- 2) Firm maintains a list of all securities holdings for itself, and anyone associated with this advisory practice. These holdings are reviewed on a regular basis by John Marchisotta.
- 3) Firm requires that all individuals must act in accordance with all applicable federal and state regulations governing registered investment advisory practices.
- 4) Any individual not in observance of the above may be subject to termination.

Firm is in and shall continue to be in total compliance with The Insider Trading and Securities Fraud Enforcement Act of 1988. Specifically, Firm has adopted a firm wide policy statement outlining insider trading compliance by Firm and its associated persons and other employees of Firm, and said statement has been reviewed, dated and signed by each such person. A copy of such firm wide policy is left with such person and the original is maintained in a master file. Further, Firm has adopted a written supervisory procedures statement highlighting the steps which shall be taken to implement the firm wide policy. These materials are also distributed to all associated persons and other employees of Firm, are signed, dated and filed with insider trading compliance materials. There are provisions adopted for (1) restricting access to files, (2) providing continuing education, (3) restricting and/or monitoring trading on those securities of which Firm's employees, if any, may have non-public information, (4) requiring all of Firm's employees, if any, to conduct their trading

through a specified broker or reporting all transactions promptly to Firm, and (5) monitoring the securities trading of the firm and its employees and associated persons.

Brokerage Practices

Form ADV Part 2A, Item 12

To the extent that the client requires that the firm recommend a broker/dealer/custodian for execution and or custodial services (exclusive of those clients that direct the firm to use specific broker/dealer/custodian), the firm generally recommends that investment management accounts be maintained at various broker/dealers and or custodians, including, but not limited to SEI Private Trust Company (SPTC). In connection with certain products or services, notably mutual fund transactions, the firm may use other registered broker/dealers as custodians, such as TD Ameritrade, First Mercantile Trust and or Charles Schwab and Company.

Factors which the firm considers in recommending a particular broker/dealer/custodian to client include financial strength, reputation, execution, pricing, research, reporting and service. In return for effecting securities transactions through a designated broker/dealer/custodian, the firm may receive certain investment research products and/or services which assist the firm in its investment decision-making process for the client pursuant section 28(e) of the Securities Exchange Act of 1934. This is known as a soft dollar arrangement. Investment research products and/or services received by the firm may include, but are not limited to, analyses pertaining to specific securities, companies or sectors, market, financial and economic studies and forecast, financial publications, portfolio management systems and statistical and pricing services. Although the commissions paid by the firm's clients shall comply with the obligation to obtain "best execution", the client may pay a commission that is higher than another qualified broker/dealer may charge to effectuate the same transaction where the firm determines, in good faith, that the commission is reasonable in relation to the value of the brokerage and research services received. In seeking "best execution", the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of broker/dealer services, including the value of research provided, execution, capability, commission rates and responsiveness. Accordingly, although the firm will seek competitive rates, it may not necessarily obtain the lowest possible commission rates for client account transactions. Although the investment and research, products, and/or services that may be obtained by the firm will generally be used to service the firm's clients, a brokerage commission paid by a specific client may be used to pay for research that is not used in managing that specific client's account. With respect to investment research, products, and/or services obtained by the firm that have a mixed use of both research and non-research (i.e.: administrative, etc.) function, the firm shall make a reasonable allocation of the cost of the product or service according to its use - the percentage of the product or service that provides assistance to the firm's investment decision-making products will be paid for with soft dollars while that portion which provided administrative or other non-research assistance will be paid for by the firm with hard dollars. The brokerage commissions and/or transaction fees charged by the designated broker/dealer/custodian are exclusive of, and in addition to the firm's investments management fee.

The firm may suggest that the client uses the particular broker/dealer/custodian (for example, UBS, Mellon, Park Avenue Securities, Brinker Capital, etc.) to execute some or all transactions for the client's account based upon the size of the client, complexity of the engagement, underlying fees, goal, objectives and negotiations with the client. In the event that the client directs the firm to effectuate securities transactions for the client's accounts to a specific broker/dealer/custodian, the client correspondingly acknowledges that such direction may cause the accounts to incur higher commissions or transaction costs than the accounts would otherwise incur, had the client determined to effectuate account transactions through alternative clearing arrangements that may be available to the firm. In the event that the transactions for a client's accounts are effectuated for a broker/dealer/custodian, which refers investment management clients to this firm, there exists a potential for

conflict of interest if the accounts incur higher commission or transaction costs than the accounts would otherwise have incurred, had the client determined to effectuate account transactions through alternative clearing arrangements that may have been available through the firm.

Client may direct the firm to use a particular broker/dealer to execute some or all transactions for the client's account, subject to the firm's right to decline or terminate the engagement. In such event, the client will negotiate terms and arrangements for the account with that broker/dealer, and the firm will not seek better execution services or prices from other broker/dealers or be able to "batch" the client's transactions for execution through other broker/dealers with orders for other accounts managed by the firm. As a result, the client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account that would otherwise be the case. In the event that transactions for client accounts are executed through a broker/dealer that refers investment management clients to the firm, the potential for a conflict of interest exists.

Review of Accounts

Form ADV Part 2A, Item 13

For those clients to whom the firm provides investment supervisory services, account reviews are conducted on an annual basis by the firm's managing members, Roger Ciacco or John Marchisotta. All investment, supervisory and financial planning clients are advised that it remains their responsibility to advise the firm of any changes in their investment objectives and/or financial situation.

All clients (in person, electronically or telephonically) are encouraged to comprehensively review financial planning issues, investment objectives and account performance with the firm on an annual basis.

Clients are provided with transaction confirmation notices and regular summary account statements directly from the broker/dealer/custodian for the client accounts and/or the independent investment advisors engaged by the client to provide ongoing investment/supervisory or management services.

Client Referrals and Other Compensation

Form ADV Part 2A, Item 14

The firm acts as a solicitor and may collect a referral fee for recommending that a client's financial plan be put into effect by unaffiliated registered investment advisers, National Network of Accountants Investment Advisors, Brinker, Mellon Financial, UBS, and Financial Educational Advisors, LLC and its principal, Dean Giella. These registered investment advisers' Form ADV, Part 2 "Brochure" narrative statements will be provided to all impacted clients. All referral fees are paid in accordance with applicable federal securities laws and regulations.

Custody

Form ADV Part 2A, Item 15

None.

Investment Discretion

Form ADV Part 2A, Item 16

Since the firm has discretionary authority, the firm will have the ability to determine, without first obtaining specific client consent, the securities to be bought and/or sold and the amount of securities to be bought and/or sold.

Voting Client Securities

Form ADV Part 2A, Item 17

The firm does not vote proxy statements on behalf of advisory clients.

Financial Information

Form ADV Part 2A, Item 18

No financial reporting is necessary as the firm does not require the payment of fees more than six months in advance.

Requirements for State-Registered Advisers

Form ADV Part 2A, Item 19

Not applicable.

Additional Information

None.