

Item 1: Cover Sheet

## INFORMATIONAL BROCHURE

# FINANCIAL PLANNING, LLC

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Lawrence O. Kamin, Chief Compliance Officer

May 16, 2018

This brochure provides information about the qualifications and business practices of LK Financial Planning, LLC ("LKFP"). If you have any questions about the contents of this brochure, please contact us at (646) 644-6292. 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 LK Financial Planning, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2: Material Changes

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LK Financial Planning LLC is required to report any material changes to this ADV Part 2A in this Item. There are no material changes to report since the last filing.

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## Item 4: Advisory Business

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### A. Description of the Advisory Firm

LK Financial Planning LLC is a Limited Liability Company organized in the state of New York.

This firm was formed in April of 2012, and the principal owner is Lawrence O. Kamin.

### B. Types of Advisory Services

LK Financial Planning LLC (hereinafter "LKFP") offers the following services to advisory clients:

#### *Investment Supervisory Services*

LKFP offers ongoing portfolio management services based on the individual goals, objectives, time horizon, income, assets, tax situation, and risk tolerance of each client. For those clients who seek portfolio management, LKFP creates an Investment Policy Statement that sets forth a recommended asset allocation tailored to each client's specific situation. Investment Supervisory Services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

LKFP evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. In most cases, LKFP will request discretionary authority from clients in order to select securities appropriate for the recommended asset allocation and execute transactions without permission from the client prior to each transaction.

#### *Financial Planning*

Financial plans and financial planning may include, but are not limited to advice related to: investment planning, life insurance; tax concerns; retirement planning; college planning; and debt/credit planning. These services are based on fixed fees or hourly fees and the final fee structure is documented in the Financial Planning Agreement.

If you request, LKFP may recommend the services of other professionals for implementation purposes. You are under no obligation to engage the services of any such recommended professional. You retain absolute discretion over all such implementation decisions and are free to accept or reject any recommendation from LKFP. If you engage any professional recommended by LKFP, and a dispute arises thereafter relative to such engagement, you agree to seek recourse exclusively from and against the engaged professional.

### ***Services Limited to Specific Types of Investments***

LKFP generally limits its investment advice and/or money management to mutual funds, equities, bonds, fixed income, debt securities, ETFs, real estate, hedge funds, REITs, insurance products including annuities, private placements, and government securities. The securities portfolios managed by LKFP consist principally of mutual funds and ETFs.

### **C. Client Tailored Services and Client Imposed Restrictions**

LKFP offers the same suite of services to all of its clients. The specific services to be performed are set forth in the client agreement. Moreover specific client financial plans and their implementation are dependent upon the client Investment Policy Statement which is based upon each client's current situation (income, tax levels, and risk tolerance levels) and sets forth a client specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets.

Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent LKFP from properly servicing the client account, or if the restrictions would require LKFP to deviate from its standard suite of services, LKFP reserves the right to end the relationship.

### **D. Wrap Fee Programs**

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and any other administrative fees. LKFP does not participate in any wrap fee programs.

### **E. Assets Under Management**

As of April 30, 2018, LKFP had a total of \$66,055,820 assets under management across 40 Discretionary accounts.

## **Item 5: Fees and Compensation**

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### **A. Fee Schedule**

#### ***Investment Supervisory Services Fees***

There are three types of fee arrangements that LKFP enters into – hourly rate, fixed fee, and AUM based fees. The type of fee arrangement is negotiated with each client depending upon the needs of the client and complexity of the situation, and are set forth in the Investment Advisory Contract. Hourly rate fees, generally between \$250 and \$350 per hour, are billed and collected after the services are rendered. Fixed fees are based on a contract period, they are negotiable, and are also collected after the services are rendered, in some cases, directly from the client's accounts. With respect to AUM based fee arrangements, those fees may be withdrawn directly from the client's accounts with client written authorization, and will not exceed 1.00% of assets under management.

## ***Financial Planning Fees***

### ***Fixed Fees***

Depending upon the complexity of the situation and the needs of the client, the rate for creating client financial plans is between \$0 and \$25,000. Financial plans may also be done on the basis of an hourly rate, with a maximum charge set forth in the Financial Planning or Client Agreement. The fees are negotiable and the final fee schedule will be set forth in the Client Agreement. Depending on the arrangement with the client, fees are paid in arrears upon completion or in advance, but never more than three months in advance. Clients may terminate their contracts without penalty within five business days of signing the advisory contract. The fee refunded will be the balance of the fees collected in advance minus the hourly rate times the number of hours of work that has been completed up to and including the day of termination.

### ***Hourly Fees***

Depending upon the complexity of the situation and the needs of the client, the hourly fee for these services is between \$250 and \$350. The fees are negotiable and the final fee schedule will be contained in the Client Agreement. Generally, fees are paid in arrears upon completion. Clients who are charged fees based upon hourly charges for work will also be responsible for reasonable disbursements of LKFP, billed at cost, incurred in rendering the services. Clients may terminate their contracts without penalty within five business days of signing the advisory contract.

All clients, but especially those with smaller accounts, should be advised they may receive similar services from other professionals for higher or lower overall costs.

## **B. Payment of Fees**

### ***Payment of Investment Supervisory Fees***

Advisory fees fixed by contract are either billed directly to the client on a quarterly in arrears basis, or deducted from the client's account, quarterly in arrears, if the client's account is custodied with Fidelity Wealth Management. The advisory fee is paid quarterly, in arrears, based upon the market value of the assets being managed by LKFP on the last day of the previous billing period as valued by the custodian of your assets. For example, if your annual fee is 1.00%, each quarter we will multiply the value of your account on the last day of the previous billing period by 1.00%, then divide by 4 to calculate our fee. Advisory fees based upon assets under management may be withdrawn directly from the client's accounts with client written authorization. Advisory fees may also be invoiced and billed directly to the client. Dates of payment will vary depending on the arrangement with the client. Clients may select the method in which they are billed.

### ***Payment of Financial Planning Fees***

Hourly Financial Planning fees are paid via check in arrears upon completion or in advance, but never more than three months in advance. The fee refunded will be the balance of the

fees collected in advance minus the hourly rate times the number of hours of work that has been completed up to and including the day of termination.

Fixed Financial Planning fees are paid via check in arrears upon completion or in advance, but never more than three months in advance. Fees that are charged in advance will be refunded based on the prorated amount of work completed at the point of termination.

All clients, but especially those with smaller accounts, should be advised they may receive similar services from other professionals for higher or lower overall costs.

### **C. Other Fees**

Clients are responsible for the payment of all third party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by LKFP. Please see Item 12 of this brochure regarding broker/custodian. Clients who are charged fees based upon hourly charges for work will also be responsible for reasonable disbursements of LKFP, billed at cost, incurred in rendering the services.

### **D. Prepayment of Fees**

In some cases, LKFP may collect fees in advance. If so, in the event of termination, fees collected in advance will be refunded based on the prorated amount of work completed at the point of termination and the total days during the billing period. Fees will be returned within fourteen days to the client via check.

LKFP will cease to perform services, including processing trades and distributions, upon termination. Assets not transferred from terminated accounts within 30 (thirty) days of termination may be "de-linked", meaning they will no longer be visible to LKFP and will become a retail account with the custodian. All clients, but especially those with smaller accounts, should be advised they may receive similar services from other professionals for higher or lower overall costs.

### **E. Outside Compensation for the Sale of Securities to Clients**

Neither LKFP nor its supervised persons accept any compensation for the sale of securities or other investment products, including asset-based sales charges or services fees from the sale of mutual funds.

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

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LKFP does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

## Item 7: Types of Clients

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LKFP generally provides investment advice and/or management supervisory services to Individuals and High-Net-Worth Individuals.

There is no account minimum per se, however LKFP does not presently have any clients with less than \$2 million in securities.

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

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### A. Methods of Analysis and Investment Strategies

#### *Methods of Analysis and Investment Strategies*

LKFP believes that the proper approach to investing involves balancing of risk and reward. Different asset classes have different risk/reward characteristics. Diversification between and among different asset classes reduces risk. Depending upon a variety of factors, such as age, needs, resources, and investment temperament, LKFP and client determine the appropriate risk reward parameters for the overall diversified portfolio. That profile is then achieved by investing, almost exclusively, in ETFs or low-cost mutual funds (including index funds) that capture the asset classes in the proposed portfolio. Rebalancing of the portfolio is generally geared to specific ranges of asset holdings. To the extent possible and practical, investments are made in taxable, tax-deferred and tax-free accounts to maximize tax efficiency.

Additionally, part of the LKFP process includes, where appropriate, involving multiple generations in order to facilitate family financial planning. This can increase the financial education of the later generations and manage expectations. However, potential for conflicts of interest exist with the exchange of intergenerational information. LKFP attempts to minimize these conflicts by treating each household as its own fiduciary relationship. Information can only be shared across generations with each household's consent.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

### B. Material Risks Involved

Long term trading is designed to capture market rates of both return and risk. Frequent trading and short-term trading, when done, can affect investment performance, particularly through increased brokerage and other transaction costs and taxes. Such trading also entails greater risk. LKFP attempts to avoid frequent and/or short term trading. Nonetheless, even long-term investing involves risks of loss of principal and loss of market power that cannot be eliminated through diversification or otherwise.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**



## C. Risks of Specific Securities Utilized

LKFP generally seeks investment strategies that do not involve significant or unusual risk beyond that of the general domestic and/or international equity markets.

**Mutual Funds:** Investing in mutual funds carries the risk of capital loss. Mutual funds are not guaranteed or insured by the FDIC or any other government agency. You can lose money investing in mutual funds. All mutual funds have costs that lower investment returns. They can be of bond “fixed income” nature (lower risk) or stock “equity” nature (mentioned above). In addition, certain mutual funds can track commodities, and real estate indices, and others may mimic the investment behavior of various hedge funds.

**Equity** investment generally refers to buying shares of stocks by an individual or firms in return for receiving a future payment of dividends and capital gains if the value of the stock increases. There is an innate risk involved when purchasing a stock that it may decrease in value and the investment may incur a loss.

**Treasury Inflation Protected/Inflation Linked Bonds:** The Risk of default on these bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal.

**Fixed Income** is an investment that guarantees fixed periodic payments in the future that may involve economic risks such as inflationary risk, interest rate risk, default risk, repayment of principal risk, etc.

**Debt Securities** carry risks such as the possibility of default on the principal, fluctuation in interest rates, and counterparties being unable to meet obligations.

**Stocks & Exchange Traded Funds (ETF):** Investing in stocks & ETF's carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Investments in these securities are not guaranteed or insured by the FDIC or any other government agency. ETFs resemble mutual funds in many ways and bear the same risks that mutual funds of the same asset category bear.

**Real Estate** funds face several kinds of risk that are inherent in this sector of the market. Liquidity risk, market risk and interest rate risk are just some of the factors that can influence the gain or loss that is passed on to the investor. Liquidity and market risk tend to have a greater effect on funds that are more growth-oriented, as the sale of appreciated properties depends upon market demand. Conversely, interest rate risk impacts the amount of dividend income that is paid by income-oriented funds.

**Hedge Funds** are not suitable for all investors and involve a high degree of risk due to several factors that may contribute to above average gains or significant losses. Such factors include leveraging or other speculative investment practices, commodity trading, complex tax structures, a lack of transparency in the underlying investments, and generally the absence of a secondary market.

**REITs** have specific risks including valuation due to cash flows, dividends paid in stock rather than cash, and the payment of debt resulting in dilution of shares.

**Commodities** are an asset category which can be represented in an investment portfolio by various securities that hold the commodities or invest in derivatives of such products. They carry a substantial risk of capital loss.

**Private placements** carry a substantial risk as they are largely unregulated offerings not subject to securities laws.

**Precious Metal ETFs** (Gold, Silver, Palladium Bullion backed “electronic shares” not physical metal): Investing in precious metal ETFs carries the risk of capital loss.

**Long term trading** is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various other types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

**Short term trading** risks include liquidity, economic stability and inflation.

**Past performance is not a guarantee of future returns.** Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

## **Item 9: Disciplinary Information**

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### **A. Criminal or Civil Actions**

There are no criminal or civil actions to report.

### **B. Administrative Proceedings**

There are no administrative proceedings to report.

### **C. Self-regulatory Organization (SRO) Proceedings**

There are no self-regulatory organization proceedings to report.

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

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### **A. Registration as a Broker/Dealer or Broker/Dealer Representative**

Neither LKFP nor its representatives are registered as or have pending applications to become a broker/dealer or as representatives of a broker/dealer.

## **B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor**

Neither LKFP nor its representatives are registered as or have pending applications to become a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor.

## **C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests**

Neither LKFP nor its representatives have any relationships with other individuals or entities that are likely to create any conflicts of interest.

## **D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections**

LKFP does not utilize nor select other advisers or third party managers for assets under its management. On occasion, LKFP may recommend to clients other advisers or third-party managers specializing in particular asset classes or strategies. LKFP receives no compensation for such recommendations, and clients are under no obligation to accept such recommendations.

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

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## **A. Code of Ethics**

We have a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Our Code of Ethics is available free upon request to any client or prospective client.

## **B. Recommendations Involving Material Financial Interests**

LKFP does not recommend that clients buy or sell any security in which a related person to LKFP or LKFP has a material financial interest other than as follows: LKFP may invest, on behalf of its clients, in mutual funds or ETFs which are present, in some degree or other, in the investment portfolio of LKFP or a related person to LKFP.

## **C. Investing Personal Money in the Same Securities as Clients**

LKFP does not recommend or engage in unsolicited transactions of the equities of individual companies or of individual bonds. If representatives of LKFP bought or sold such securities

for themselves that they also recommended to clients, that would theoretically provide an opportunity for representatives of LKFP to profit from the recommendations they provide to clients. Such transactions would create a conflict of interest. LKFP will always document any transactions that could be construed as conflicts of interest. Should any such transactions present themselves, LKFP will always transact client business before their own when similar securities are being bought or sold.

#### **D. Trading Securities At/Around the Same Time as Clients' Securities**

See Section C. above.

### **Item 12: Brokerage Practices**

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#### **A. Factors Used to Select Custodians and/or Broker/Dealers**

LKFP does not require its clients to maintain accounts at any particular brokerage company or custodian. LKFP has recommended several different custodians, including Fidelity Brokerage Services LLC, (CRD# 7784), and Vanguard Brokerage Services based on their relatively low transaction fees and access to mutual funds and ETFs. LKFP will never charge a premium or commission on transactions, beyond the actual cost imposed by Custodian.

##### **1. *Research and Other Soft-Dollar Benefits***

Fidelity provides LKFP with some non-cash benefits (not available to retail customers) in return for placing client assets with them or executing trades through them. Such non-cash benefits are referred to as "soft dollars." Currently, these benefits come in the form of investment research and sponsored attendance at various investment seminars. LKFP may also receive such items as investment software, books and research reports. These products, services or educational seminars are items that may play a role in determining how to invest client accounts. LKFP receives a benefit from these services as otherwise we might be compiling the same research ourselves. This may cause us, or another adviser, to want to place more client accounts with a broker-dealer/custodian such as Fidelity solely because of these added benefits. However, the value to all of our clients of these benefits is included in our evaluation of custodians. Products and services received via soft dollars will generally be used for the benefit of all clients. Soft dollars provide additional value, and are accordingly considered in determining which broker-dealer or custodian to utilize as part of our best execution analysis.

##### **2. *Brokerage for Client Referrals***

LKFP receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

##### **3. *Clients Directing Which Broker/Dealer/Custodian to Use***

LKFP allows clients to direct brokerage.

## **B. Aggregating (Block) Trading for Multiple Client Accounts**

Block trading may benefit a large group of clients by providing LKFP the ability to purchase larger blocks resulting in smaller transaction costs to the client. While LKFP does have the ability to engage in block trading at Fidelity, it has never actually engaged in a block trade due to its small number of clients, the highly individualized portfolios it maintains, and its focus on mutual funds. LKFP may in the future engage in block trading through one or more custodians or broker/dealers.

## **Item 13: Reviews of Accounts**

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### **A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews**

Client accounts are reviewed at least quarterly only by Lawrence O. Kamin, Managing Member. Lawrence O. Kamin is the one and only advisor and reviews clients' accounts with regards to their investment policies and risk tolerance levels. All accounts at LKFP are assigned to this reviewer.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Lawrence O. Kamin, Managing Member. There is only one level of review and that is the total review conducted to create the financial plan.

### **B. Factors That Will Trigger a Non-Periodic Review of Client Accounts**

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

### **C. Content and Frequency of Regular Reports Provided to Clients**

Each client will receive at least quarterly from the custodian, a written report that details the client's account including assets held and asset value which will come from the custodian.

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

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### **A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)**

LKFP does not receive any economic benefit, directly or indirectly from any third party for advice rendered to LKFP clients.

## **B. Compensation to Non – Advisory Personnel for Client Referrals**

LKFP does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

### **Item 15: Custody**

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LKFP has an arrangement with Fidelity Brokerage Services permitting it to take a direct fee deduction from clients' accounts for the deduction of LKFP's fees only. To that extent, LKFP has limited custody of client's assets to the extent of those fees only. In each such case, LKFP has obtained written authorization from the client to take such limited custody. In such case, clients will receive all required account statements from the custodian. Clients should carefully review those statements for accuracy. Please alert us to any discrepancies.

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

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For those client accounts where LKFP provides ongoing supervision, the client has given LKFP written discretionary authority over the client's accounts with respect to securities to be bought or sold and the amount of securities to be bought or sold. Details of this relationship are fully disclosed to the client before any advisory relationship has commenced. The client provides LKFP discretionary authority via a limited power of attorney in the Investment Advisory Contract that the client reviews and executes and in the contract between the client and the custodian.

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

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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. LKFP will not accept authority to vote client securities. Clients will receive their proxies directly from the custodian for the client account. LKFP will not give clients advice on how to vote proxies.

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

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LKFP 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.

Item 1: Cover Sheet

## **BROCHURE SUPPLEMENT**

for

**Lawrence O. Kamin**

CRD Number: 6035867

Investment Adviser Representative

**LK** FINANCIAL PLANNING, LLC

545 5<sup>th</sup> Avenue, Suite 640  
New York, New York, 10017  
(646) 644-6292

**February 28, 2018**

*This brochure supplement provides information about Lawrence O. Kamin that supplements the LK Financial Planning LLC brochure. You should have received a copy of that brochure. Please contact Lawrence O. Kamin, Managing Member if you did not receive LK Financial Planning LLC's brochure or if you have any questions about the contents of this supplement.*

## **Item 2: Educational Background and Business Experience**

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Lawrence O. Kamin , b. 1950

### **Education Background and Professional Designations:**

#### **Education:**

BA Political Science, SUNY Stony Brook – 1973  
JD Columbia Law School - 1976

#### **Business Background:**

02/2012 – Present     Managing Member, LK Financial Planning LLC  
07/2010 – 02/2012   Self-employed, LK Financial Planning  
08/1976 – 06/2010   Partner, Willkie Farr & Gallagher LLP

## **Item 3: Disciplinary Information**

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There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

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

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Lawrence O. Kamin is not engaged in any investment-related business or occupation (other than this advisory firm).

## **Item 5: Additional Compensation**

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Other than direct compensation from LK Financial Planning LLC, Lawrence O. Kamin does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through LK Financial Planning LLC.



## Item 6: Supervision

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As the only owner and representative of LK Financial Planning LLC, Lawrence O. Kamin supervises all duties and activities of the firm. Lawrence O. Kamin's contact information is on the cover page of this disclosure document. Lawrence O. Kamin adheres to all required regulations regarding the activities of an Investment Adviser Representative and follows all policies and procedures outlined in the firm's policies and procedures manual, including the Code of Ethics, and appropriate securities regulatory requirements.

## LK FINANCIAL 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

LK FINANCIAL PLANNING LLC 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.