



## S.E.E.D. Planning Group, LLC

ADV Part 2A – Disclosure Brochure

Part 2B – Disclosure Supplements

Privacy Policy

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

31 Lewis St, Suite 401, Binghamton, NY 13901

**S.E.E.D. Planning Group, LLC  
Form ADV Part 2A – Disclosure Brochure**

**Effective: August 27, 2018**

This Form ADV2A (“Disclosure Brochure”) provides information about the qualifications and business practices of S.E.E.D. Planning Group, LLC (“S.E.E.D.” or the “Advisor”). If you have any questions about the contents of this Disclosure Brochure, please contact us at (607) 217-5091.

S.E.E.D. is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information through S.E.E.D. to assist you in determining whether to retain the Advisor.

Additional information about S.E.E.D. and its advisory persons are available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching for our firm name or by our firm CRD # - 188521.

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## Item 2 – Material Changes

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Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about advisory personnel of S.E.E.D.

S.E.E.D. believes that communication and transparency are the foundation of its relationship with Clients and will continually strive to provide its Clients with complete and accurate information at all times. S.E.E.D. encourages all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

### Material Changes

The following changes have been made since the last annual update filed on March 3, 2017:

Item 5: The Advisor has revised the Investment Management fees

Items 4 and 5: The Advisor has update the description of its wealth management services and fees.

Item 10: Advisory persons no longer receive commissions on the sale of insurance products as investments.

Item 14: The Advisor no longer compensates solicitors for client referrals.

### Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of S.E.E.D.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching for our firm name or by our firm CRD # - 188521. You may also request a copy of this Disclosure Brochure at any time, by contacting us at (607) 217-5091.

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## Item 4 – Advisory Services

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### A. Firm Information

S.E.E.D. Planning Group, LLC (“S.E.E.D.” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”), which is organized as a Limited Liability Company (“LLC”) under the laws of the State of New York. S.E.E.D. was founded in December 2012 and registered with the SEC in April 2015. S.E.E.D. is owned and operated by Travis E. Maus (Managing Partner, Wealth Manager, and Chief Compliance Officer), Ryan S. Berkeley (Chief Financial Officer, Partner, and Wealth Manager), Frederick Costantino (Chief Investment Officer, Partner, and Wealth Manager), Amy Michaels (Partner and Financial Planner), and Stephen Campbell (Partner and Director of Community Engagement). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by S.E.E.D.

### B. Advisory Services Offered

S.E.E.D. offers investment advisory services to individuals, high net worth individuals, trusts, estates, businesses and retirement plans (each referred to as a “Client”).

#### Investment Management Services

S.E.E.D. provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management and consulting services. S.E.E.D. works with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio strategy and asset allocation. S.E.E.D. will then construct a traditional portfolio, consisting of diversified mutual funds and/or exchange-traded funds (“ETFs”) to achieve the Client’s investment goals. The Advisor may also utilize individual securities and other investments, as appropriate, to construct a customized or a socially responsible portfolio to meet the needs of its Clients.

S.E.E.D.’s investment strategy is primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held less than one year to meet the objectives of the Client or due to market conditions. S.E.E.D. will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to acceptance by the Advisor.

S.E.E.D. evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. S.E.E.D. may recommend, on occasion, redistributing investment allocations to diversify the portfolio. S.E.E.D. may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement. S.E.E.D. may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client's risk tolerance.

S.E.E.D. will provide investment advisory services and portfolio management services and will not provide securities custodial or other administrative services. At no time will S.E.E.D. accept or maintain custody of a Client's funds or securities, except for authorized deduction of the Advisor's fees. All Client assets will be managed within their designated brokerage account or pension account, pursuant to the Client investment advisory agreement.

S.E.E.D. may provide access to the SAGE Scholars Tuition Rewards® Program, which would allow Clients to receive tuition rewards points based upon the assets managed by S.E.E.D.. Participants can earn up to 1 full year's tuition at participating private colleges and universities through SAGE Scholars Rewards® Program. Each tuition reward point is equal to \$1.00 in discounts and represents the minimum scholarship that a sponsored student will receive if he or she attends a participating college. S.E.E.D. will assist the Clients in the account registration, and will manage the crediting of tuition rewards points accreditation with the SAGE account on a periodic basis. This service is offered at no additional cost to clients. Please see Item 10 for Additional information regarding S.E.E.D.'s affiliation with the SAGE Scholars Rewards® Program.

#### Financial Planning Services

S.E.E.D. will typically provide a variety of financial planning services to individuals, families, and business pursuant to a written financial planning agreement. Services are offered in several areas of a Client's financial situation, depending on their goals, objectives and financial situation.

Generally, such financial planning services will involve preparing a financial plan or rendering a financial consultation based on the Client's financial goals and objectives. This planning or consulting may encompass one or more areas of need, including, but not limited to investment planning, retirement planning, personal savings, education savings and other areas of a Client's financial situation.

A financial plan developed for or financial consultation rendered to the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs. S.E.E.D. may also refer Clients to an accountant, attorney or other specialist, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of Client's financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary. Plans or consultations are typically completed within six months of contract date, assuming all information and documents requested are provided promptly.

Financial planning and consulting recommendations may pose a potential conflict between the interests of the Advisor and the interests of the Client. For example, a recommendation to engage the Advisor for investment management services or to increase the level of investment assets with the Advisor would pose a conflict, as it would increase the advisory fees paid to the Advisor. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to place the transaction through the Advisor.

#### S.E.E.D. Wealth Management Program

**S.E.E.D. Wealth Management** is a division of the Advisor that provides comprehensive financial planning and investment services exclusively for clients with managed investment account sizes of \$1,000,000 or more. Clients managed by the S.E.E.D. Wealth Management division receive standard services of:

- 1) Retirement and general financial planning and advice
- 2) Survivorship planning
- 3) Investment management
- 4) Estate planning



- 5) Family and charitable gift planning
- 6) Elder care planning

Additional services are provided in a limited fashion including:

- 1) Tax planning and preparation services
- 2) Business planning services
- 3) Medicare planning services
- 4) Record keeping (including document shredding)
- 5) Family credits (to be used towards covering the financial planning fees of family members)
- 6) Legal credits (to be used towards legal fees associated with updating estate documents, etc)

S.E.E.D. Wealth Management will provide a credit for these services up to an aggregated total of \$1000 after 6 months of engagement and up to an aggregated total of \$3000 after 12 months of engagement on a rolling three-year basis. Credits for these services will be made directly to the service provider and are not a reimbursement. These credits have no cash value and are forfeited if not used. Credits do not accrue when the client's aggregated investments managed within the program fall below \$1,000,000.

S.E.E.D. Wealth Management reserves the right to properly vet and approve or decline potential service providers. Each S.E.E.D. Wealth Management contract is for a three-year period.

#### CORE Financial Planning Program

**CORE** is a program offered by the Advisor for individuals and couples who are preparing for, transitioning into, or who are already in retirement. Clients participating in the CORE program receive standard services of:

- 1) Budgeting, debt, and savings goals
- 2) Retirement, cash flow, and tax planning
- 3) Pension and Social Security Planning
- 4) College planning
- 5) Investment planning
- 6) Employee retirement plans and benefit selection
- 7) Insurance needs analysis
- 8) Estate and elder care planning

Clients may request standard balanced (Speculative, Aggressive, Moderate Aggressive, Moderate, Conservative Plus, Conservative, Principal Focused) portfolio allocation recommendations (Mutual Funds and/or ETFs) for accounts comprised of Vanguard Mutual Funds or accounts custodied at Charles Schwab and Co. Clients are not obligated to use the standard allocation recommendations. Clients who do use the standard allocation recommendations are solely responsible for all transactions.

#### SPROUT Financial Planning Program

**SPROUT** is a division of the Advisor that provides comprehensive financial planning and investment services for individuals and couples who are getting started with financial planning and investing. Clients managed by the SPROUT division receive standard services of:

- 1) Building a Budget
- 2) Setting Savings Goals
- 3) Managing Debt
- 4) Managing Student Loans
- 5) Investing
- 6) Employee Retirement Plan Support
- 7) Employee Benefit Selection
- 8) Life and Disability Insurance Planning
- 9) Estate Planning

#### Retirement Plan Advisory Services

S.E.E.D. may provide the following retirement plan advisory services:

- 1) Vendor Analysis
- 2) Employee Enrollment and Education Tracking
- 3) Investment Policy (IPS) Support
- 4) Investment Management
- 5) Performance Reports
- 6) Ongoing Investment Recommendation and Assistance
- 7) ERISA 404© Assistance
- 8) Benchmarking Services

S.E.E.D. may provide investment advisory services on behalf of the Plan and Plan Sponsor, which may be in either a 3(21) or 3(38) context depending on whether or not the Advisor is also providing discretionary investment management over the Plan assets. For 3(38) services the Advisor shall have the discretion to select the

investments for the Plan and/or make investment decisions on behalf of Plan Participants.

#### Tax Planning Services

S.E.E.D. also provides tax planning and preparation services for Clients. Clients are not obligated to utilize this service in order to engage S.E.E.D. for advisory services. S.E.E.D. engages an unaffiliated Certified Public Accountant ("CPA") and/or Enrolled Agent(s) ("EA") to perform these tax services.

#### Business Consulting Services

S.E.E.D. may provide consulting services to businesses, pursuant to a written agreement. Generally, consulting services involve rendering general assessments including, but not limited to, business plans and business structure. The Advisor will also assist in the structuring and implementation of an exit plan. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor.

#### SEEDs of Hope

SEEDs of Hope is a division of S.E.E.D. Planning Group, LLC that provides investment stewardship consulting and legacy gifting program consulting to nonprofits. SEEDs of Hope charges an hourly or per project rate and may from time-to-time donate specific services to a charitable organization as good-will.

### **C. Client Account Management**

Prior to engaging S.E.E.D. to provide investment advisory services, each Client is required to enter into an investment advisory agreement with the Advisor that defines the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Policy – S.E.E.D., in connection with the Client will establish the Client's investment goals and objectives along with the broad strategy[ies] to be employed to meet the objectives.
- Asset Allocation – S.E.E.D. will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance for risk for each Client.

- Portfolio Construction – S.E.E.D. will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – S.E.E.D. will provide investment management and ongoing oversight of the Client's portfolio and overall account.

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

S.E.E.D. does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by S.E.E.D.

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

As of December 31, 2017 S.E.E.D. manages approximately \$92,581,723.00 in assets, all of which are on a discretionary basis.

Clients may request more current information at any time by contacting the Advisor.

### **Item 5 – Fees and Compensation**

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The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client shall sign an investment advisory agreement that details the responsibilities of S.E.E.D. and the Client.

#### **A. Fees for Advisory Services**

##### Investment Management Services

The Advisor's fee is exclusive of, and in addition to, brokerage fees, transaction fees, and other related costs and expenses, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

Investment advisory fees are paid quarterly, in advance of each quarter, pursuant to the terms of the investment advisory agreement. Investment advisory fees are based on the market value of assets under management at the end of the previous month. Investment advisory fees are based on the type of portfolio[s] based on the following schedule:

Accounts Under \$25,000 the minimum account fee is:

\$0-\$3,000	\$1.50 per month
\$3,000.01-\$6,000	\$4 per month
\$6,000.01-\$9,000	\$6.50 per month
\$9,000.01-\$15,000	\$10.50 per month
\$15,000.01-\$20,000	\$15 per month
\$20,000.01-\$25,000	\$19 per month

\*Accounts with this fee schedule do not qualify for aggregate pricing.

Accounts Over \$25,000

First \$500,000	1.10%
Next \$500,000	0.86%
Next \$1,000,000	0.58%
Next \$2,000,000	0.42%
Amount over \$4,000,000	0.30%

\*Accounts with this fee schedule qualify for aggregate household and family group pricing.

### S.E.E.D. Wealth Management Service

\$0-\$1000000	1.00%
\$1000000.01-\$1500000	0.75%
\$1500000.01-\$2000000	0.50%
\$2000000.01+	0.20%

Investment advisory fees in the first month of service are prorated from the inception date of the account[s] to the end of the first month. Fees may be negotiable at the discretion of the Advisor. The Client's fees will take into consideration the aggregate assets under management with Advisor. All securities held in accounts managed by S.E.E.D. will be independently valued by the designated Custodian. S.E.E.D. will not have the authority or responsibility to value portfolio securities.

### CORE Financial Planning Program

Charges for the CORE program are \$2300 for the first year and \$1800 per year in subsequent years plus a percentage of assets under management or a percentage of investable assets as described below. The annual fee is payable in monthly installments of \$150 per month with \$500 due up front at the initial engagement. The monthly installments may be paid by credit card or a designated Charles Schwab investment account.

For Clients with investment accounts who select not to utilize the Advisor's investment management services, a yearly charge of .20% (1/5 of 1 percent) of all investable assets, that would have otherwise been eligible for the Advisor's investment management services, will be charged (entirely) at the start of each 12-month period in addition to the charges outlined above. This charge covers the

additional risk assumed and the time required by the Advisor to continually analyze, assess, and update the financial planning due to the Client's held away investment program. Charges will be calculated based on the entire account values as represented by the Client's most recent account statements (no older than the most recently completed calendar quarter) or other electronic verification methods.

#### SPROUT Financial Planning Program

Charges for the SPROUT program are \$800 for individuals or \$1100 for couples in the first year and \$480 for individuals or \$600 for couples per year in subsequent years. The annual fee is payable \$200 due up front at the initial engagement and monthly installments of \$50 for individuals or \$75 for couples in the first year and \$40 for individuals or \$50 for couples per year in each subsequent year. The monthly installments may be paid by credit card or a designated Charles Schwab investment account.

#### Financial Planning, Business Consulting and Tax Planning Services

S.E.E.D. offers financial planning, business consulting and tax planning services at a negotiated hourly rate or on a fixed fee per engagement, which may be negotiable depending on the nature and complexity of each Client's circumstances. An estimate for total hours and/or costs will be determined prior to engaging the Advisor. The Advisor may also be engaged for ongoing planning services based on a monthly retainer.

#### Retirement Plan Advisory Services

Retirement plan advisory fees are negotiable and are paid monthly, quarterly, semiannually or annually pursuant to the terms of the retirement plan advisory agreement. Fees are fixed or hourly with a minimum fee based on plan size. Qualified plan managed portfolio options for participants are .3% of the participant's assets under management. Fees are negotiable based on the size and complexity of the services provided to the Plan.

### **B. Fee Billing**

#### Investment Management Services

Investment advisory fees will be calculated by the Advisor and deducted from the Client's account at the Custodian. The amount due is calculated by applying the periodic rate (annual rate divided by 365 multiplied by the number of days in the quarter) to the total assets under management with S.E.E.D. at the end of most recently completed quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee. It

is the responsibility of the Client to verify the accuracy of these fees as listed on the Custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting S.E.E.D. to be paid directly from their accounts held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

#### Financial Planning, Business Consulting and Tax Planning Services

Financial planning is paid in advance or may, in some cases, be paid via a payment plan. Business planning is offered generally with a minimum fixed fee and then billed hourly no more often than monthly. Tax planning is either a) paid in advance if paid by check, or b) billed upon completion if paid by pre-authorized credit card or brokerage deduction.

#### Retirement Plan Advisory Services

Fees for retirement plan advisory services may be deducted from the accounts of the Plan Participants of paid by the Plan Sponsor Pursuant to the Client's written authorization.

### **C. Other Fees and Expenses**

Clients may incur certain fees or charges imposed by third parties, other than S.E.E.D., in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custodial and securities execution fees charged by the Custodian and executing broker-dealer. The investment advisory fee charged by S.E.E.D. is separate and distinct from these custody and execution fees.

In addition, all fees paid to S.E.E.D. for investment advisory services are separate and distinct from the expenses charged by mutual funds and exchange-traded funds to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client could invest in these products directly, without the services of S.E.E.D., but would not receive the services provided by S.E.E.D. which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by S.E.E.D. to fully understand the total fees to be paid.

### **D. Advance Payment of Fees and Termination**

#### Investment Management Services

S.E.E.D. is compensated for its services in advance of the quarter in which investment advisory services are rendered. Either party may terminate the investment advisory agreement by providing advance written notice to the other party. The Client shall be responsible for investment advisory fees up to and including the effective date of termination. Upon termination, the Advisor will refund any unearned, prepaid investment advisory fees from the effective date of termination to the end of the month. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's written approval.

#### Financial Planning, Business Consulting and Tax Planning Services

S.E.E.D. may be compensated for its financial planning, business consulting or tax planning services in advance. Either party may terminate a planning agreement at any time by providing written notice to the other party. Upon termination, the Client shall be billed for actual hours logged on the planning project times the agreed upon hourly rate or as a percentage of completion for a fixed fee engagement. Upon termination, any unearned, prepaid fees will be promptly refunded to the Client.

#### Retirement Plan Advisory Services

Either Party may request to terminate their services with S.E.E.D. in whole or in part by providing advance written notice to the other party. The Client shall be responsible for advisory fees up to and including the effective date of termination. The Client's retirement plan services agreement with the Advisor is non-transferable without the Client's written approval.

#### Financial Planning Programs Refund Policy

It is expected that the Advisor may perform a significant amount of work and significant benefits could be received by Clients early in a program's term. Clients who terminate the SPROUT and CORE financial planning programs early may not be entitled to a refund (subject to a five (5) day free-look period) and may still be responsible for the remaining outstanding balance due for the remainder of the contract term.

The SPROUT and CORE financial planning programs automatically renew every subsequent 12-month period. Programs may be cancelled by the Client or Advisor with verbal or written notification no later than the renewal date.

### **E. Compensation for Sales of Securities**



S.E.E.D. does not buy or sell securities and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above.

#### Item 6 – Performance-Based Fees and Side-By-Side Management

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S.E.E.D. does not charge performance-based fees for its investment advisory services. The fees charged by S.E.E.D. are as described in “Item 5 – Fees and Compensation” above and are not based upon the capital appreciation of the funds or securities held by any Client.

S.E.E.D. does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

#### Item 7 – Types of Clients

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S.E.E.D. offers investment advisory services to individuals, high net worth individuals, trusts, estates, businesses and retirement plans. The relative percentage of each type of Client is available on S.E.E.D.’s Form ADV Part 1. These percentages will change over time. The account minimum for that service is \$0.

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

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##### **A. Methods of Analysis**

S.E.E.D. primarily employs fundamental analysis methods in developing investment strategies for its Clients. Research and analysis from S.E.E.D. is derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

As noted above, S.E.E.D. generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. S.E.E.D. will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, S.E.E.D. may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

##### **B. Risk of Loss**

S.E.E.D. Planning Group, LLC ADV 2B

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. S.E.E.D. will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

Fundamental analysis utilizes economic and business indicators as investment selection criteria. These criteria are generally ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in "Item 13 – Review of Accounts".

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. **Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.**

#### Item 9 – Disciplinary Information

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There are no legal, regulatory or disciplinary events to disclose. S.E.E.D. and its advisory personnel value the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service

provider with whom you partner. Our backgrounds are on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching for our firm name or by our CRD # 188521.

## Item 10 – Other Financial Industry Activities and Affiliations

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### Private College Saving Program Affiliation

The Advisor participates in the SAGE Scholars Rewards® Program, which is an independently owned and operated organization that allows individuals to earn tuition rewards. Clients are not obligated to implement any recommendation provided by the Advisor or its Advisory Persons. S.E.E.D. receives no compensation or benefits from SAGE Scholars Rewards® Program and does not participate in the management or day to day business activities of the SAGE Scholars Rewards® Program.

### SEEDs of Hope

Principals of S.E.E.D. are also Directors of SEEDs of Hope, a donor advised fund at the Community Foundation of South Central New York. The Advisor contributes a portion of S.E.E.D.'s revenue for charitable giving purposes to the donor advised fund.

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

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### **A. Code of Ethics**

S.E.E.D. has implemented a Code of Ethics that defines our fiduciary commitment to each Client. This Code of Ethics applies to all persons associated with S.E.E.D (our "Supervised Persons"). The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. S.E.E.D. and its personnel owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of S.E.E.D. associates to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code of Ethics covers a range of topics that address employee ethics and conflicts of interest. To request a copy of our Code of Ethics, please contact us at (607) 217-5091.

### **B. Personal Trading with Material Interest**

S.E.E.D. allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. S.E.E.D. does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advise an investment company. S.E.E.D. does not have a material interest in any securities traded in Client accounts.

### **C. Personal Trading in Same Securities as Clients**

S.E.E.D. allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities that we recommend (purchase or sell) to you presents a potential conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted, consistent with Section 204A of the Investment Advisers Act of 1940, a Code of Ethics, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. When trading for personal accounts, employees of S.E.E.D. may have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can potentially be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by S.E.E.D. requiring reporting of personal securities trades by its Supervised Persons for review by the employee's supervisor or the CCO. We have also adopted written policies and procedures to detect the misuse of material, non-public information.

In addition, the Code of Ethics governs Gifts and Entertainment given by and provided to the Advisor, outside employment activities of employees, Employee reporting, sanctions for violations of the Code of Ethics, and records retention requirements for various aspects of the Code of Ethics.

### **D. Personal Trading at Same Time as Client**

While S.E.E.D. allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterwards. **At no time will S.E.E.D., or any Supervised Person of S.E.E.D., transact in any security to the detriment of any Client.**

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## **Item 12 – Brokerage Practices**

### **A. Recommendation of Custodian[s]**

S.E.E.D. does not have discretionary authority to select the broker-dealer/custodian for custodial and execution services or the administrator for defined contribution accounts. The Client will select the broker-dealer or custodian (herein the "Custodian") to safeguard Client assets and authorize S.E.E.D. to direct trades to this Custodian as agreed in the investment advisory agreement. Further, S.E.E.D. does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

Where S.E.E.D. does not exercise discretion over the selection of the Custodian, it may recommend the Custodian to Clients for execution and/or custodial services. Clients are not obligated to use the recommended Custodian and will not incur any extra fee or cost associated with using a broker not recommended by S.E.E.D. S.E.E.D. may recommend a custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, and location of the Custodian's offices. S.E.E.D. does not receive research services, other products, or compensation as a result of recommending a particular Custodian that may result in the Client paying higher commissions than those obtainable through other custodians.

S.E.E.D. will generally recommend that Clients establish their account[s] at Charles Schwab & Co., Inc. ("Schwab"), a FINRA-registered broker-dealer and member SIPC. Schwab will serve as the Client's "qualified custodian". S.E.E.D. maintains an institutional relationship with Schwab, whereby the Advisor receives economic benefits from Schwab (Please see Item 14 below.) In addition, S.E.E.D. may also recommend MG Trust as a custodian for some retirement plan accounts.

Following are additional details regarding the brokerage practices of the Advisor:

**1. *Soft Dollars*** - Soft dollars are revenue programs offered by broker-dealers whereby an advisor enters into an agreement to place security trades with the broker in exchange for research and other services. **S.E.E.D. does not participate in soft dollar programs sponsored or offered by any broker-dealer.**

**2. *Brokerage Referrals*** - S.E.E.D. does not receive any compensation from any third party in connection with the recommendation for establishing a brokerage account.

**3. *Directed Brokerage*** - All Clients are serviced on a "directed brokerage basis", where S.E.E.D. will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their

respective brokerage account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). In selecting the Custodian, S.E.E.D. will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

## **B. Aggregating and Allocating Trades**

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the broker. S.E.E.D. will execute its transactions through an unaffiliated broker-dealer selected by the Client. S.E.E.D. may aggregate orders in a block trade or trades when securities are purchased or sold through the same broker-dealer for multiple (discretionary) accounts. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular Client accounts.

## **Item 13 – Review of Accounts**

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### **A. Frequency of Reviews**

Securities in Client accounts are monitored on a regular and continuous basis by the Advisor. Formal reviews are generally conducted at least annually or more or less frequently depending on the needs of the Client. Financial planning Clients may engage the Advisor for ongoing planning or for various check-up services.

### **B. Causes for Reviews**

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more or less frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account. The Client is encouraged to notify S.E.E.D. if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material market, economic or political events.

### C. Review Reports

The Client will receive brokerage statements no less than quarterly from Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

## Item 14 - Client Referrals and Other Compensation

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### A. Compensation Received by S.E.E.D.

S.E.E.D. is a fee-only advisory firm, who, in all circumstances, is compensated solely by the Client. S.E.E.D. does not receive commissions or other compensation from product sponsors, broker-dealers or any un-related third party. S.E.E.D. may refer Clients to various third parties to provide certain financial services necessary to meet the goals of its Clients. Likewise, S.E.E.D. may receive referrals of new Clients from a third-party.

#### Participation in Institutional Advisor Platform

S.E.E.D. has established an institutional relationship with Schwab through its "Schwab Advisor Services" unit, a division of Schwab dedicated to serving independent advisory firms like S.E.E.D. As a registered investment advisor participating on the Schwab Advisor Services platform, S.E.E.D. receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Schwab. Services provided by Schwab Advisor Services benefit the Advisor and many, but not all services provided by Schwab will benefit Clients. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a custodian creates a potential conflict of interest since these benefits may influence the Advisor's recommendation of this custodian over one that does not furnish similar software, systems support, or services.

*Services that Benefit the Client* – Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of Client's funds and securities. Through Schwab, the Advisor may be

able to access certain investments and asset classes that the Client would not be able to obtain directly or through other sources. In addition, the Advisor may be able to invest in certain mutual funds and other investments without having to adhere to investment minimums that might be required if the Client were to directly access the investments. Further, Schwab's institutional brokerage services may include a reimbursement of account transfer fees for Clients of the Advisor.

*Services that May Indirectly Benefit the Client* – Schwab provides participating advisors with access to technology, research, discounts and other services. In addition, the Advisor receives duplicate statements for Client accounts, the ability to deduct advisory fees, trading tools, and back office support services as part of its relationship with Schwab. These services are intended to assist the Advisor in effectively managing accounts for its Clients, but may not directly benefit all Clients.

*Services that May Only Benefit the Advisor* – Schwab also offers other services and financial support to S.E.E.D. that may not benefit the Client, including: educational conferences and events, financial start-up support, consulting services and discounts for various service providers. Access to these services creates a financial incentive for the Advisor to recommend Schwab, which results in a potential conflict of interest. S.E.E.D. believes, however, that the selection of Schwab as Custodian is in the best interests of its Clients.

#### Item 15 – Custody

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S.E.E.D. does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Advisor's fee. All Clients must place their assets with a qualified custodian. Clients are required to select their own custodian to retain their funds and securities and direct S.E.E.D. to utilize the Custodian for the Client's security transactions. S.E.E.D. encourages Clients to review statements provided by the Custodian. For more information about custodians and brokerage practices, see "Item 12 - Brokerage Practices".

#### Item 16 – Investment Discretion

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S.E.E.D. generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by S.E.E.D. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an



investment advisory agreement containing all applicable limitations to such authority. All discretionary trades made by S.E.E.D. will be in accordance with each Client's investment objectives and goals.

#### Item 17 – Voting Client Securities

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S.E.E.D. does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

#### Item 18 – Financial Information

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Neither S.E.E.D., nor its management, have any adverse financial situations that would reasonably impair the ability of S.E.E.D. to meet all obligations to its Clients. Neither S.E.E.D., nor any of its advisory persons, has been subject to a bankruptcy or financial compromise. S.E.E.D. is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect fees of \$1,200 or more for services to be performed six months or more in advance.

## Form ADV Part 2B – Brochure Supplement

**Travis E. Maus, AIFA®**

Managing Partner, Wealth Manager, Chief Compliance Officer

**Effective: August 27, 2018**

This Form ADV2B (“Brochure Supplement”) provides information about the background and qualifications of Travis E. Maus (CRD# **5394182**) in addition to the information contained in the S.E.E.D. Planning Group, LLC (“S.E.E.D.” or the “Advisor”) (CRD # 188521) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the S.E.E.D. Disclosure Brochure or this Brochure Supplement, please contact us at (607) 217-5091.

Additional information about Mr. Maus is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Educational Background and Business Experience

Travis E. Maus, born in 1981, is dedicated to advising Clients of S.E.E.D. as the Chief Executive Officer and Chief Compliance Officer. Mr. Maus earned an Associates in Graphic Design from the Art Institute of Pittsburgh in 2003. Mr. Maus attended the Rochester Institute of Technology from 2000 to 2001. Additional information regarding Mr. Maus' employment history is included below.

### Employment History:

CEO, S.E.E.D. Planning Group, LLC Registered Investment Advisor (04/2015 to Present)	01/2013 to Present
CEO, S.E.E.D. Financial Strategies, LLC	07/2013 to Present
Registered Representative, Cetera Advisors LLC	06/2013 to 08/2016
Investment Advisor Representative, Cetera Advisors LLC	06/2013 to 08/2016
EVP and Retirement Planning Specialist, AXA Advisors, LLC	07/2007 to 06/2013
Branch Manager, HSBC Finance	03/2005 to 07/2007

### Accredited Investment Fiduciary ("AIFA®")

The AIFA® mark is held by the Center for Fiduciary Studies, LLC, a Fiduciary360 (fi360) company.

The professional designations awarded by fi360 demonstrate the focus on all the components of a comprehensive investment process, related fiduciary standards of care, and commitment to excellence.

The AIFA® designees receive advanced training in both prudent investment processes and assessment principles with the primary purpose of performing assessments of an Investment Steward's, Investment Advisor's, or Investment Manager's conformance to a Global Fiduciary Standard of Excellence using fi360's ISO-like procedure of assessment.

## Item 3 – Disciplinary Information

S.E.E.D. Planning Group, LLC ADV 2B

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***There are no legal, civil or disciplinary events to disclose regarding Mr. Maus.***

However, we do encourage you to independently view the background of Mr. Maus on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or by his Individual CRD# 5394182.

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

##### Community Foundation of South Central New York

Mr. Maus, in his own capacity, volunteers at the Community Foundation of South Central New York located in Johnson City, New York. Mr. Maus' duties include reviewing grants and serving on the planning committee. He spends less than 1 hour per month in his volunteer role during trading hours. Mr. Maus is also Director of SEEDs of Hope, a donor advised fund at the Community Foundation of South Central New York. In this capacity, Mr. Maus contributes a portion of S.E.E.D.'s revenue for charitable giving purposes to the donor advised fund. He spends less than 1 hour per month in this capacity.

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

Mr. Maus is dedicated to the investment advisory activities of S.E.E.D.'s Clients. Mr. Maus does not receive any additional forms of compensation.

#### **Item 6 – Supervision**

Mr. Maus serves as the CEO and Chief Compliance Officer of S.E.E.D. Mr. Maus can be reached at (607) 217-5091.

S.E.E.D. has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of S.E.E.D. Further, S.E.E.D. is subject to regulatory oversight by various agencies. These agencies require registration by S.E.E.D. and its employees. As a registered entity, S.E.E.D. is subject to examinations by regulators, which may be announced or unannounced. S.E.E.D. is required to periodically update the information provided to these

agencies and to provide various reports regarding the business activities and assets of the Advisor.

## Form ADV Part 2B – Brochure Supplement

**Ryan S. Berkeley, AIF®APMA®**  
Chief Financial Officer, Partner, and Wealth Manager

**Effective: August 27, 2018**

This Form ADV2B (“Brochure Supplement”) provides information about the background and qualifications of Ryan S. Berkeley (CRD# **5950169**) in addition to the information contained in the S.E.E.D. Planning Group, LLC (“S.E.E.D.” or the “Advisor”) (CRD # 188521) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the S.E.E.D. Disclosure Brochure or this Brochure Supplement, please contact us at (607) 217-5091.

Additional information about Mr. Berkeley is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Educational Background and Business Experience

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Ryan S. Berkeley, born in 1985 is dedicated to advising the Clients of S.E.E.D. as a Financial Planner. Mr. Berkeley earned a Bachelor of Arts in Music and a Concentration in Music Management from Manhattanville College in 2008. Additional information regarding Mr. Berkeley's employment history is included below.

### Employment History:

Partner and Wealth Manager, S.E.E.D. Planning Group, LLC	05/2015 to Present
Registered Representative, Cetera Advisors LLC	06/2013 to 08/2016
Investment Advisor Representative, Cetera Advisors LLC	06/2013 to 08/2016
Registered Representative, AXA Advisors, LLC	07/2011 to 06/2013
Marketing Specialist, NAC Enterprises, Ltd.	09/2008 to 07/2011
Administrative Assistant, Judith Finell Music Services	02/2007 to 12/2007

### Accredited Investment Fiduciary ("AIF®")

The AIF® mark is held by the Center for Fiduciary Studies, LLC, a Fiduciary360 (fi360) company.

The professional designations awarded by fi360 demonstrate the focus on all the components of a comprehensive investment process, related fiduciary standards of care, and commitment to excellence. AIF® designees undergo an initial training program, annual continuing education, and pledge to abide by the designation's code of ethics.

Since October 2002, the Accredited Investment Fiduciary® (AIF®) designation has been the mark of commitment to a standard of investment fiduciary excellence. Those who earn the AIF® mark successfully complete a specialized program on investment fiduciary standards of care and subsequently passed a comprehensive examination. AIF® designees demonstrate a thorough understanding of fi360's Prudent Practices for investment advisors and stewards.

### Accredited Portfolio Management Advisor ("APMA®")

APMA® designation is obtained through a completed course of study encompassing client assessment and suitability, risk/return, investment objectives, bond and equity portfolios, modern portfolio theory and investor psychology. Students have hands-on practice in analyzing investment policy statements,

building portfolios, and making asset allocation decisions including sell, hold, and buy decisions within a client's portfolio. The program is designed for 80-100 hours of self-study. The program is self-paced and must be completed within one year from enrollment.

### Item 3 – Disciplinary Information

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Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***There are no legal, civil or disciplinary events to disclose regarding Mr. Berkeley.***

However, we do encourage you to independently view the background of Mr. Berkeley on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or with his Individual CRD# 5950169.

### Item 4 – Other Business Activities

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SEEDS of Hope for the Community Foundation of South Central New York  
Mr. Berkeley is a Director of SEEDs of Hope, a donor advised fund at the Community Foundation of South Central New York. In this capacity, Mr. Berkeley contributes a portion of S.E.E.D.'s revenue for charitable giving purposes to the donor advised fund. He spends less than 1 hour per month in this capacity.

#### Hillcrest Rotary Club

Mr. Berkeley serves on the Board of Directors at Hillcrest Rotary Club located in Binghamton, New York. In this role, Mr. Berkeley is responsible for overseeing community service. He spends less than 1 hour per week in this capacity, none of which is during trading hours.

Mr. Berkeley is a Treasurer at Hillcrest Rotary located at 13745. Hillcrest Rotary is a local Rotary International club, a service organization committed to taking action to create lasting change. He started with the business on October 16, 2013. He oversee club financials, including keeping the books, distributing checks and collecting money where he does not received compensation. He devotes 4 hours



during trading hours and 2 hours outside trading hours. He is not affiliated with the principal control person and it is not investment related.

Town of Colesville

Mr. Berkeley serves on the Planning Board with the town of Colesville.

Real Estate LLC

Mr. Berkeley is a member of a JDRQ Rentals, LLC which owns rental property.

Item 5 – Additional Compensation

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Mr. Berkeley is dedicated to the investment advisory activities of S.E.E.D.'s Clients. Mr. Berkeley does not receive any additional forms of compensation.

Item 6 – Supervision

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Mr. Berkeley serves as a Financial Planner with S.E.E.D. and is supervised by Travis Maus, the Chief Compliance Officer. Mr. Maus can be reached at (607) 217-5091.

S.E.E.D. has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of S.E.E.D. Further, S.E.E.D. is subject to regulatory oversight by various agencies. These agencies require registration by S.E.E.D. and its employees. As a registered entity, S.E.E.D. is subject to examinations by regulators, which may be announced or unannounced. S.E.E.D. is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

## Form ADV Part 2B – Brochure Supplement

Amy C. Michaels, CFP®, AIF®

Partner and Financial Planner

**Effective: May 21, 2018**

This Form ADV2B (“Brochure Supplement”) provides information about the background and qualifications of Amy C. Michaels in addition to the information contained in the S.E.E.D. Planning Group, LLC (“S.E.E.D.” or the “Advisor”) (CRD # 188521) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the S.E.E.D. Disclosure Brochure or this Brochure Supplement, please contact us at (607) 217-5091.

Additional information about S.E.E.D. is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Educational Background and Business Experience

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Amy C. Michaels, born in 1993, is dedicated to advising Clients of S.E.E.D. as a Financial Planner. Ms. Michaels earned a Bachelor of Science in Financial Economics from Binghamton University in 2015. Additional information regarding Ms. Michaels's employment history is included below.

### Employment History:

Financial Planner, S.E.E.D. Planning Group, LLC	08/2014 to Present
Financial Planning Intern, Lesko Financial Services	06/2013 to 05/2014
Server, Applebees	05/2013 to 02/2014
Office Assistant, Arctic Bear Heating & Air	05/2010 to 09/2013
Server, American Food & Vending	06/2010 to 08/2013
Server, Castle Gardens	05/2011 to 08/2011
Cashier, McDonalds	05/2010 to 08/2010

### 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 62,000 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, administered in 10 hours over a two-day period, 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.

#### Accredited Investment Fiduciary ("AIF®")

The AIF® mark is held by the Center for Fiduciary Studies, LLC, a Fiduciary360 (fi360) company.

The professional designations awarded by fi360 demonstrate the focus on all the components of a comprehensive investment process, related fiduciary standards of care, and commitment to excellence. AIF® designees undergo an initial training program, annual continuing education, and pledge to abide by the designation's code of ethics.

Since October 2002, the Accredited Investment Fiduciary® (AIF®) designation has been the mark of commitment to a standard of investment fiduciary excellence. Those who earn the AIF® mark successfully complete a specialized program on investment fiduciary standards of care and subsequently passed a comprehensive examination. AIF® designees demonstrate a thorough understanding of fi360's Prudent Practices for investment advisors and stewards.

#### Item 3 – Disciplinary Information

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Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***There are no legal, civil or disciplinary events to disclose regarding Ms. Michaels.***

#### Item 4 – Other Business Activities

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Ms. Michaels is dedicated to the investment advisory activities of S.E.E.D.'s Clients.

#### Item 5 – Additional Compensation

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Ms. Michaels is dedicated to the investment advisory activities of S.E.E.D.'s Clients. Ms. Michaels does not receive any additional forms of compensation.

#### Item 6 – Supervision

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Ms. Michaels serves as the Junior Financial Planner of S.E.E.D. and is supervised by Travis Maus, the Chief Compliance Officer. Travis Maus can be reached at (607) 217-5091.

S.E.E.D. has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of S.E.E.D. Further, S.E.E.D. is subject to regulatory oversight by various agencies. These agencies require registration by S.E.E.D. and its employees. As a registered entity, S.E.E.D. is subject to examinations by regulators, which may be announced or unannounced. S.E.E.D. is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

## Form ADV Part 2B – Brochure Supplement

Joseph M. Conwell  
Financial Advisor

**Effective: September 6, 2016**

This Form ADV2B ("Brochure Supplement") provides information about the background and qualifications of Joseph M. Conwell (CRD# **2286493**) in addition to the information contained in the S.E.E.D. Planning Group, LLC ("S.E.E.D." or the "Advisor") (CRD # 188521) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the S.E.E.D. Disclosure Brochure or this Brochure Supplement, please contact us at (607) 217-5091.

Additional information about Mr. Conwell is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Educational Background and Business Experience

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Joseph M. Conwell, born in 1951, is dedicated to advising Clients of S.E.E.D. as a Financial Planner. Mr. Conwell earned a B.S. Accounting & Finance from S.U.N.Y. Binghamton in 1973. Additional information regarding Mr. Conwell's employment history is included below.

### Employment History:

Financial Advisor, S.E.E.D. Planning Group, LLC	01/2016 to Present
Registered Representative, Cetera Advisors LLC	01/2016 to 08/2016
Financial Advisor, Lesko Financial Services, Inc.	09/2006 to 01/2016

## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Conwell.*** Mr. Conwell has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Conwell.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Conwell.***

However, we do encourage you to independently view the background of Mr. Conwell on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or with his Individual CRD# 2286493.

## Item 4 – Other Business Activities

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### Insurance Agency Affiliations

S.E.E.D. Planning Group, LLC ADV 2B



Mr. Conwell is also a licensed insurance professional. Mr. Conwell's insurance activities are limited to the sale of Medicare and Medicaid supplement plans.

#### Item 5 – Additional Compensation

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Mr. Conwell has additional business activities that are detailed in Item 4 above.

#### Item 6 – Supervision

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Mr. Conwell serves as a Financial Advisor of S.E.E.D. and is supervised by Travis Maus, the Chief Compliance Officer. Mr. Maus can be reached at (607) 217-5091.

S.E.E.D. has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of S.E.E.D. Further, S.E.E.D. is subject to regulatory oversight by various agencies. These agencies require registration by S.E.E.D. and its employees. As a registered entity, S.E.E.D. is subject to examinations by regulators, which may be announced or unannounced. S.E.E.D. is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

## Form ADV Part 2B – Brochure Supplement

**Frederick G. Costantino, CFP®, CRPC®, CPM®, AIF®**

Chief Investment Officer, Partner, and Wealth Manager

**Effective: June 12, 2017**

This Form ADV2B (“Brochure Supplement”) provides information about the background and qualifications of Frederick G. Costantino (CRD# **3129677**) in addition to the information contained in the S.E.E.D. Planning Group, LLC (“S.E.E.D.” or the “Advisor”) (CRD # 188521) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the S.E.E.D. Disclosure Brochure or this Brochure Supplement, please contact us at (607) 217-5091.

Additional information about Mr. Costantino is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Educational Background and Business Experience

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Frederick G. Costantino, born in 1975, is dedicated to advising Clients of S.E.E.D. as the Chief Investment Officer and a Wealth Manager. Mr. Costantino earned a B.A. in Economics from Binghamton University (S.U.N.Y.) in 1999. Additional information regarding Mr. Costantino's employment history is included below.

### Employment History:

Chief Investment Officer and Wealth Manager, S.E.E.D. Planning Group, LLC	06/2016 to Present
Financial Advisor, Morgan Stanley	09/2013 to 06/2016
Financial Advisor, Wells Fargo Advisors	01/2009 to 09/2013
Financial Advisor, Raymond James Financial Services, Inc	04/2002 to 01/2009
Tax Preparer, Self Employed	07/2005 to 01/2009
Financial Advisor, The Costantino Group, LLC	12/2005 to 01/2009

### 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 62,000 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, administered in 10 hours over a two-day period, 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.

### Chartered Retirement Planning Counselor CRPC®

Individuals who hold the CRPC® designation have completed a course of study encompassing pre-and post-retirement needs, asset management, estate planning and the entire retirement planning process using models and techniques from real

client situations. Additionally, individuals must pass an end-of-course examination that tests their ability to synthesize complex concepts and apply theoretical concepts to real-life situations.

All designees have agreed to adhere to [Standards of Professional Conduct](#) and are subject to a disciplinary process.

Designees renew their designation every two-years by completing 16 hours of continuing education, reaffirming adherence to the Standards of Professional Conduct and complying with self-disclosure requirements.

### Certified Portfolio Manager CPM®

The Certified Portfolio Manager (CPM®) designation is a collaboration of the Academy of Certified Portfolio Managers (ACPM) and Columbia University. The academic component is designed for financial services industry professionals in order to provide a deeper understanding of security analysis, asset allocation, and portfolio management concepts.

Once accepted to the program candidates must complete an online self-study course (150-200 hours), attend a five-day residential program at Columbia University and pass a final exam.

ACPM certification maintenance standards require that all certificate holders (CPM®) accumulate 20 continuing education unit hours (CE hours) of professional development every year, abide by the ACPM Code of Ethics and maintain affiliation by paying annual dues and being an active member of ACPM.

### Accredited Investment Fiduciary ("AIF®")

The AIF® mark is held by the Center for Fiduciary Studies, LLC, a Fiduciary360 (fi360) company.

The professional designations awarded by fi360 demonstrate the focus on all the components of a comprehensive investment process, related fiduciary standards of care, and commitment to excellence. AIF® designees undergo an initial training program, annual continuing education, and pledge to abide by the designation's code of ethics.

Since October 2002, the Accredited Investment Fiduciary® (AIF®) designation has been the mark of commitment to a standard of investment fiduciary excellence.

Those who earn the AIF® mark successfully complete a specialized program on investment fiduciary standards of care and subsequently passed a comprehensive examination. AIF® designees demonstrate a thorough understanding of fi360's Prudent Practices for investment advisors and stewards.

### Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Costantino.*** Mr. Costantino has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Costantino.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Costantino.***

However, we do encourage you to independently view the background of Mr. Costantino on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his individual CRD # 3129677.

### Item 4 – Other Business Activities

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#### Broome County Habitat for Humanity

Mr. Costantino, in his own capacity, serves on the board of the Broome County Habitat for Humanity, Endicott, NY. In this role, Mr. Costantino serves as the Vice President, receives no compensation and spends up to 3 hours per month in this role during non-trading hours.

### Item 5 – Additional Compensation

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Mr. Costantino is dedicated to the investment advisory activities of S.E.E.D.'s Clients. Mr. Costantino does not receive any additional forms of compensation.

## Item 6 – Supervision

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Mr. Costantino serves as the Wealth Manager of S.E.E.D. and is supervised by Travis Maus, the Chief Compliance Officer. Travis Maus can be reached at (607) 217-5091.

S.E.E.D. has implemented a Code of Ethics and internal compliance that guide each Supervised Person in meeting their fiduciary obligations to Clients of S.E.E.D.. Further, S.E.E.D. is subject to regulatory oversight by various agencies. These agencies require registration by S.E.E.D. and its Supervised Persons. As a registered entity, S.E.E.D. is subject to examinations by regulators, which may be announced or unannounced. S.E.E.D. is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

## Item 7 – Requirements for State Registered Advisors

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Mr. Costantino does not have any additional information to disclose.

## Form ADV Part 2B – Brochure Supplement

Stephen J Campbell

Partner and Director of Community Engagement

**Effective: April 03, 2018**

This Form ADV2B (“Brochure Supplement”) provides information about the background and qualifications of Stephen J. Campbell in addition to the information contained in the S.E.E.D. Planning Group, LLC (“S.E.E.D.” or the “Advisor”) (CRD # 6066061) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the S.E.E.D. Disclosure Brochure or this Brochure Supplement, please contact us at (607) 217-5091.

Additional information about S.E.E.D. is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).



## Item 2 – Educational Background and Business Experience

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Stephen J Campbell, born in 1986, is dedicated to advising Clients of S.E.E.D. as an Investment Advisor Representative. Mr. Campbell earned a Masters of Education Social Studies, Binghamton University in 2010 and Bachelors of Arts History, Rutgers University in 2009. Additional information regarding Mr. Campbell's employment history is included below.

### Employment History:

Investment Advisor Representative, S.E.E.D. Planning Group, LLC	05/2017 to Present
Financial Advisor, Morgan Stanley	05/2012 to 05/2017
Salesman, Gault Audi	05/2011 to 05/2012

## Item 3 – Disciplinary Information

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Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***There are no legal, civil or disciplinary events to disclose regarding Mr. Campbell.***

## Item 4 – Other Business Activities

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### Greater Binghamton Chamber of Commerce

Stephen J Campbell is on the Greater Binghamton Chamber of Commerce Government Affairs Committee. He spends one hour a month on this activity. He is also on the Binghamton University Forum Membership Committee where he spends one hour a month on these activities.

### United Way of Broome County

Stephen J Campbell is on the United Way of Broome County Fundraising Campaign. He spends one hour a month on this activity.

Stephen J Campbell is the vice chair of small business division chairing the 2017-2018 campaign for United Way of Broome County. He spends one hour per month on this activity. This is a voluntary position and receives no compensation.

Calvary's Love Church, Assemblies of God

Stephen J Campbell is a Trustee at Calvary's Love Church, Assemblies of God located at Johnson City, NY. He spends 2 hours per month and receives no salary for this activity.

Item 5 – Additional Compensation

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Stephen J Campbell is dedicated to the investment advisory activities of S.E.E.D.'s Clients. Mr. Campbell does not receive any additional forms of compensation.

Item 6 – Supervision

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As a representative of S.E.E.D. Planning Group, LLC, Stephen J Campbell is supervised by Travis Maus, the firm's Chief Compliance Officer. Travis Maus is responsible for ensuring that Stephen J Campbell adheres to all required regulations regarding the activities of an Investment Adviser Representative, as well as all policies and procedures outlined in the firm's Code of Ethics and compliance manual. The phone number for Travis Maus is (607) 217-5791.

## Form ADV Part 2B – Brochure Supplement

Andrea Noel Vaioli

Wealth Manager

**Effective: July 20, 2018**

This Form ADV2B (“Brochure Supplement”) provides information about the background and qualifications of Andrea Noel Vaioli in addition to the information contained in the S.E.E.D. Planning Group, LLC (“S.E.E.D.” or the “Advisor”) (CRD # 5318774) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the S.E.E.D. Disclosure Brochure or this Brochure Supplement, please contact us at (607) 217-5091.

Additional information about S.E.E.D. is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Educational Background and Business Experience

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Andrea Noel Vaioli, born in 1980, is dedicated to advising Clients of S.E.E.D. as an Investment Advisor Representative. Ms. Vaioli has not received any higher education degrees after high school. Additional information regarding Ms. Vaioli's employment history is included below.

### Employment History:

Investment Advisor Representative, S.E.E.D. Planning Group, LLC	07/2018 to Present
Wealth Management Advisor, TIAA-CREF	12/2014 to 07/2018
Senior Financial Advisor, Metlife Securities	07/2018 to 12/2014
Senior Financial Advisor, M&T Securities	04/2010 to 06/2014
Sales, Sprint Wireless	11/2009 to 04/2010
Unemployed	05/2009 to 11/2009
Financial Advisor, Wells Fargo Advisors	04/2007 to 05/2009

## Item 3 – Disciplinary Information

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Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***There are no legal, civil or disciplinary events to disclose regarding Ms. Vaioli.***

## Item 4 – Other Business Activities

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Andrea Vaioli is the President of the Board of the Southern Tier AIDS Program (STAP), a non-profit. Andrea does not receive any compensation from this activity.

## Item 5 – Additional Compensation

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Andrea Vaioli is dedicated to the investment advisory activities of S.E.E.D.'s Clients. Ms. Vaioli does not receive any additional forms of compensation.

## Item 6 – Supervision

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As a representative of S.E.E.D. Planning Group, LLC, Andrea Vaioli is supervised by Travis Maus, the firm's Chief Compliance Officer. Travis Maus is responsible for ensuring that Andrea Noel Vaioli adheres to all required regulations regarding the activities of an Investment Adviser Representative, as well as all policies and procedures outlined in the firm's Code of Ethics and compliance manual. The phone number for Travis Maus is (607) 217-5791.

## Privacy Policy

### Effective: September 6, 2016

#### Our Commitment to You

S.E.E.D. Planning Group, LLC ("S.E.E.D." or the "Advisor") is committed to safeguarding the use of personal information of our Client's (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. S.E.E.D. (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

S.E.E.D. does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

#### Why you need to know?

Registered Investment Advisors ("RIAs") must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

#### What information do we collect from you?

Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number(s)	Income and expenses

E-mail address(es)	Investment activity
Account information (including other institutions)	Investment experience and goals

### What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

### How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

### How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
<b>Servicing our Clients</b> We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general	Yes	No

account maintenance; responding to regulators or legal investigations; and credit reporting.		
<b>Marketing Purposes</b> S.E.E.D. does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where S.E.E.D. or the client has a formal agreement with the financial institution. <b>We will only share information for purposes of servicing your accounts, not for marketing purposes.</b>	No	Not Shared
<b>Authorized Users</b> Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent(s) or representative(s).	Yes	Yes
<b>Information About Former Clients</b> S.E.E.D. does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

### Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy, and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

### Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (607) 217-5091.