

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

## **Form ADV Part 2A – Disclosure Brochure**

**Effective: April 28, 2015**

This Disclosure Brochure provides information about the qualifications and business practices of S.E.E.D. Planning Group, LLC (“S.E.E.D.”). 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).

**S.E.E.D. Planning Group, LLC**  
**CRD No: 188521**  
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**Phone: (607) 217-5091 \* Fax: (855) 838-7333**  
<http://www.seedplanninggroup.com>

## 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.

### Initial Filing

S.E.E.D. is a new Registered Investment Advisor. This is the initial filing of the Disclosure Brochure.

### 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).

To review the firm information for S.E.E.D.:

- Click **Investment Advisor Search** in the left navigation menu.
- Select the option for **Firm** and enter **188521** (our firm's CRD number) in the field labeled "Firm Name or CRD# or SEC#" and click "Start Search".
- This will provide access to Form ADV Part 1 and Part 2.
- Item 11 of the Form ADV Part 1 lists legal and disciplinary questions regarding the Advisor.
- In the left navigation menu, Form ADV Part 2 is located near the bottom.

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 (Chief Executive Officer and Chief Compliance Officer). 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 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 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.

#### Financial Planning Services

S.E.E.D. will typically provide a variety of financial planning services to individuals and families, 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.

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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 effect the transaction through the Advisor.

### **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**

S.E.E.D. is a newly established advisor. Assets under management shall be reported following the Advisor's December 31, 2015 fiscal year end. 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

Investment advisory fees are paid monthly, in advance of each month, 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:

| Assets Under Management    | Standard Portfolios | Customized Portfolios |
|----------------------------|---------------------|-----------------------|
| Up to \$100,000            | 1.25%               | 1.75%                 |
| \$101,000 to \$250,000     | 1.05%               | 1.35%                 |
| \$251,000 to \$500,000     | 0.65%               | 1.25%                 |
| \$501,000 to \$1,000,000   | 0.55%               | 1.05%                 |
| \$1,001,000 to \$2,000,000 | 0.45%               | 0.85%                 |
| \$2,001,000 to \$5,000,000 | 0.35%               | 0.65%                 |
| Over \$5,000,000           | 0.25%               | 0.45%                 |

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.

#### Financial Planning Services

S.E.E.D. offers financial planning services at rate of up to \$200 per hour 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 establishing the advisory relationship. The Advisor may also be engaged for ongoing planning services based on a monthly retainer.

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.

### B. Fee Billing

#### Investment Management Services

Investment advisory fees will be automatically deducted from the Client Account by the Custodian. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] at the respective month-end date. The amount due is calculated by applying the monthly rate (annual rate divided by 12) to the total assets under management with S.E.E.D. at the end of each month. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee. In addition, the Advisor will provide the Client a report itemizing the fee, including the calculation period covered by the fee, the account value and the methodology used to calculate the 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.

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#### Financial Planning Services

Financial planning and consulting fees are invoiced by the Advisor and are due upon receipt of the agreed upon deliverable.

#### **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 custodian 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 month in which investment advisory services are rendered. Clients may request to terminate their investment advisory agreement with S.E.E.D., in whole or in part, by providing advance written notice. 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 Services

In the event that a Client should wish to cancel the financial planning agreement under which any plan is being created, 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. Any surplus in the Advisor's possession as the result of collecting a deposit at the time of signing the financial planning agreement will be returned to the Client within 5 business days following termination.

Either party may terminate a planning agreement at any time by providing written notice to the other party. In addition, the Client may terminate the agreement within five (5) days of signing the Advisor's financial planning agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Refunds will be given on a pro rata basis.

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

S.E.E.D. does not buy or sell securities to earn commissions and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above. Advisory Persons of S.E.E.D. are also registered representatives of Cetera Advisors LLC ("Cetera"). Cetera is a registered broker-dealer (CRD No. 10299), member FINRA, SIPC. S.E.E.D. Please see Item 10.

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



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. S.E.E.D. generally does not impose a minimum account size for establishing a relationship.

## **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**

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.**

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**Clients are reminded to discuss these risks with the Advisor. For more information on our investment management services, please contact us at (607) 217-5091.**

## **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).

To review the firm information contained in Form ADV Part 1, select the option for “Investment Adviser Search”, then selecting “Firm” and enter **188521** in the field labeled “Firm Name or CRD# or SEC#”. This will provide access to Form ADV Parts 1 and 2. Item 11 of the Form ADV Part 1 lists legal and disciplinary disclosure questions.

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

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### Broker-Dealer Affiliation

Advisory Persons of S.E.E.D. are also registered representatives of Cetera Advisors LLC (“Cetera”). Cetera is a registered broker-dealer (CRD No. 10299), member FINRA, SIPC. In an Advisory Person’s separate capacity as a registered representative, the Advisory Person will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by the Advisor or its Advisory Persons. Neither the Advisor nor its Advisory Persons will earn ongoing investment advisory fees in connection with any services implemented in an Advisory Person’s separate capacity as a registered representative.

Generally, recommendations made by S.E.E.D. to its Clients are implemented by an Advisory Person in one’s role as an investment advisor representative of S.E.E.D., not in one’s role as a registered representative. As such, Clients of S.E.E.D. will only pay advisory fees as described above. In no circumstances will S.E.E.D. earn an advisory fee and a commission on the same investment. In the event that an Advisory Person earns a commission on an investment, the ongoing investment advisory fee will be waived by S.E.E.D.

### Insurance Agency Affiliations

Advisory Persons of S.E.E.D. may also be licensed insurance professionals. Implementations of insurance recommendations are separate and apart from one’s role with S.E.E.D. As an insurance professional, an Advisory Person may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by the Advisor or its Advisory Persons.

## **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. 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 employees 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

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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 employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities 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 employees 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 employees 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 associated person of S.E.E.D., transact in any security to the detriment of any Client.**

## **Item 12 – Brokerage Practices**

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### **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[s] 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 broker that may result in the Client paying higher commissions than those obtainable through other brokers.

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.)

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.**

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**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 designated 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 Mr. Maus, CEO of 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 the trustee or 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. Further, 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.

*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.

## **B. Client Referrals from Solicitors**

S.E.E.D. does not engage paid solicitors for Client referrals.

## **Item 15 – Custody**

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 that custodian for the Client's security transactions. S.E.E.D. encourages Clients to review statements provided by the account custodian. For more information about custodians and brokerage practices, see “Item 12 - Brokerage Practices”.

## **Item 16 – Investment Discretion**

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**

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

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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**

**for**

**Travis E. Maus, AIF<sup>®</sup>  
Chief Executive Officer  
Chief Compliance Officer**

**Effective: April 28, 2015**

This Brochure Supplement provides information about the background and qualifications of Travis 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).

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## 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<br>Registered Investment Advisor (04/2015 to Present)   | 01/2013 to Present                       |
| CEO, S.E.E.D. Financial Strategies, LLC<br>Registered Representative, Cetera Advisors LLC | 07/2013 to Present<br>06/2013 to Present |
| Investment Advisor Representative, Cetera Advisors LLC                                    | 06/2013 to 05/2015                       |
| Financial Advisor, AXA Advisors, LLC  | 07/2007 to 06/2013                       |
| HSBC Finance  | 03/2005 to 07/2007                       |

### Accredited Investment Fiduciary Analyst ("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. AIFA® designees undergo an initial training program, annual continuing education, and pledge to abide by the designation's code of ethics.

In response to a need for professional training to perform fiduciary assessments, fi360 introduced the Accredited Investment Fiduciary Analyst™ (AIFA®) designation in May 2006. Holders of the AIFA® mark successfully complete a specialized program on investment fiduciary standards of care and ISO assessment procedures, pass a comprehensive examination, and meet the designation's education and professional experience prerequisites. The AIFA® designees hold the knowledge necessary to understand and implement a prudent process for Investment Stewards, Investment Advisors, and Investment Managers and can perform fiduciary assessments to verify or certify an entity's conformity to CEFEX's Global Fiduciary Standard of Excellence.

## Item 3 – Disciplinary Information

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). Select "Investment Adviser Search" from the left navigation menu. Then select the option for "Individual" and enter **5394182** in the field labeled "Individual Name or CRD#".

## Item 4 – Other Business Activities

### Broker-Dealer Affiliation

Mr. Maus is also a registered representative of Cetera Advisors LLC ("Cetera"). Cetera is a registered broker-dealer (CRD No. 10299), member FINRA, SIPC. In his separate capacity as a registered representative, Mr. Maus will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by the Advisor or Mr. Maus. Neither the Advisor nor Mr. Maus will earn ongoing investment advisory fees in connection with any services implemented in Mr. Maus' separate capacity as a registered representative.

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Generally, recommendations made by S.E.E.D. to its Clients are implemented by Mr. Maus in his role as an investment advisor representative of S.E.E.D., not in his role as a registered representative. As such, Clients of S.E.E.D. will only pay advisory fees as described herein. In no circumstances will S.E.E.D. earn an advisory fee and a commission on the same investment. In the event that Mr. Maus earns a commission on an investment, the ongoing investment advisory fee will be waived by S.E.E.D.

#### Insurance Agency Affiliations

Mr. Maus is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from one's role with S.E.E.D. As an insurance professional, an Mr. Maus may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by the Advisor or Mr. Maus.

#### Item 5 – Additional Compensation

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Mr. Maus has additional business activities where compensation is received. These business activities are detailed in Item 4 above.

#### Item 6 – Supervision

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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**

**for**

**Charles W. Randall, CFP<sup>®</sup>, CPA**  
**Certified Financial Planner**

**Effective: April 28, 2015**

This Brochure Supplement provides information about the background and qualifications of Charles W. Randall (CRD# **2810219**) 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. Randall 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

Charles W. Randall, born in 1948 is dedicated to advising Clients of S.E.E.D. as a Financial Planner. Mr. Randall earned a Bachelor of Science in Business Administration from the University of Buffalo in 1973. Mr. Randall earned a Associates in Applied Science in Accounting from Broome Community College in 1968. Additional information regarding Mr. Randall's employment history is included below.

### Employment History:

|   |                    |
|---|--------------------|
| Certified Financial Planner, S.E.E.D. Planning Group, LLC | 04/2015 to Present |
| Registered Representative, Cetera Advisors LLC            | 06/2013 to Present |
| Investment Advisor Representative, Cetera Advisors LLC    | 06/2013 to 05/2015 |
| Financial Planner, AXA Advisors, LLC                      | 12/2001 to 06/2013 |

### 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.

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### **Certified Public Accountant (“CPA”)**

CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination. In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two year period or 120 hours over a three year period). Additionally, all American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous Code of Professional Conduct which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services. The vast majority of state boards of accountancy have adopted the AICPA's Code of Professional Conduct within their state accountancy laws or have created their own.

### **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. Randall.***

However, we do encourage you to independently view the background of Mr. Randall on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Select “Investment Adviser Search” from the left navigation menu. Then select the option for “Individual” and enter **2810219** in the field labeled “Individual Name or CRD#”.

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

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#### Broker-Dealer Affiliation

Mr. Randall is also a registered representative of Cetera Advisors LLC (“Cetera”). Cetera is a registered broker-dealer (CRD No. 10299), member FINRA, SIPC. In his separate capacity as a registered representative, Mr. Randall will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendations provided by the Advisor or Mr. Randall. Neither the Advisor nor Mr. Randall will earn ongoing investment advisory fees in connection with any services implemented in Mr. Randall's separate capacity as a registered representative.

Generally, recommendations made by S.E.E.D. to its Clients are implemented by Mr. Randall in his role as an investment advisor representative of S.E.E.D., not in his role as a registered representative. As such, Clients of S.E.E.D. will only pay advisory fees as described above. In no circumstances will S.E.E.D. earn an advisory fee and a commission on the same investment. In the event that Mr. Randall earns a commission on an investment, the advisory fee will be waived by S.E.E.D.

#### Insurance Agency Affiliations

Mr. Randall is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Randall's role with S.E.E.D. As an insurance professional, Mr. Randall may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by the Advisor or Mr. Randall.

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## **Item 5 – Additional Compensation**

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Mr. Randall has additional business activities where compensation is received. These business activities are detailed in Item 4 above.

## **Item 6 – Supervision**

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Mr. Randall 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**

**for**

**Ryan S. Berkeley**  
**Financial Planner**

**Effective: April 28, 2015**

This 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:

|  |                    |
|--|--------------------|
| Financial Planner, S.E.E.D. Planning Group, LLC        | 05/2015 to Present |
| Registered Representative, Cetera Advisors LLC         | 06/2013 to Present |
| Investment Advisor Representative, Cetera Advisors LLC | 06/2013 to 05/2015 |
| 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 |

## 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). Select "Investment Adviser Search" from the left navigation menu. Then select the option for "Individual" and enter **5950169** in the field labeled "Individual Name or CRD#".

## Item 4 – Other Business Activities

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### Broker-Dealer Affiliation

Mr. Berkeley is also a registered representative of Cetera Advisors LLC ("Cetera"). Cetera is a registered broker-dealer (CRD No. 10299), member FINRA, SIPC. In his separate capacity as a registered representative, Mr. Berkeley will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by the Advisor or Mr. Berkeley. Neither the Advisor nor Mr. Berkeley will earn investment advisory fees in connection with any services implemented in Mr. Berkeley's separate capacity as a registered representative.

Generally, recommendations made by S.E.E.D. to its Clients are implemented by Mr. Berkeley in his role as an investment advisor representative of S.E.E.D., not in his role as a registered representative. As such, Clients of S.E.E.D. will only pay advisory fees as described above. In no circumstances will S.E.E.D. earn an advisory fee and a commission on the same investment. In the event that Mr. Berkeley earns a commission on an investment, the advisory fee will be waived by S.E.E.D.

### Insurance Agency Affiliations

Mr. Berkeley is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Berkeley's role with S.E.E.D. As an insurance professional, Mr. Berkeley may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Berkeley or the Advisor.

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## **Item 5 – Additional Compensation**

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Mr. Berkeley has additional business activities where compensation is received. These business activities are detailed in Item 4 above.

## **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.

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

## **Privacy Policy**

**Effective: April 28, 2015**

## Privacy Policy

### 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 Clients (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.

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

31 Lewis Street, Suite 401, Binghamton, NY 13901

Phone: (607) 217-5091 \* (855) 838-7333

<http://www.seedplanninggroup.com>

| Basis For Sharing   | Do we share? | Can you limit? |
|---|--------------|----------------|
| <b>Servicing our Clients</b><br>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 account maintenance; responding to regulators or legal investigations; and credit reporting.                       | Yes          | No             |
| <b>Marketing Purposes</b><br>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><br>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><br>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.