

# FORM ADV PART 2A, APPENDIX 1 WRAP FEE PROGRAM BROCHURE



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This brochure provides information about the qualifications and business practices of Wealth Planning and Design LLC. Being registered as a registered investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at 941-361-1484. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority.

Additional information about Wealth Planning and Design Firm, LLC (CRD #281982) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

**FEBRUARY 27, 2021**



## **Item 2: Material Changes**

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### **Annual Update**

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure.

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### **Material Changes since the Last Update**

This update is in accordance with the required update for Registered Investment Advisors. Since the last filing on April 29, 2020, no material changes have occurred.



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## Item 4: Services, Fees and Compensation

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### **Firm Description**

Wealth Planning and Design LLC (“Wealth Planning and Design”) is an investment advisor registered with the Securities and Exchange Commission. Wealth Planning and Design offers investment advice to Clients through the Wrap Fee Program (“Program”) based on the individual needs of the Client. Wealth Planning and Design is the sponsor of the Program. Leetzow Group LLC is 100% owner. Leetzow Group LLC is co-owned by Joni Rametta and Leonard Leetzow, Jr. and they are responsible for management of the Program accounts.

This disclosure brochure is limited to describing the Program and other information that Client should consider prior to establishing an account in the Program. For a complete description of other programs and services offered by Wealth Planning and Design, Clients should refer to Wealth Planning and Design’s Form ADV Part 2A, a copy of which will be provided by Wealth Planning and Design to the Client upon request.

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### **Program Services**

Wealth Planning and Design provides continuous and regular supervisory services on a discretionary basis. Wealth Planning and Design will offer Clients ongoing portfolio management services through determining individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, assets allocation, portfolio monitoring and the overall investment program will be based on the above factors.

*Discretionary:* When the Client provides Wealth Planning and Design Financial discretionary authority the Client will sign a limited trading authorization or equivalent. Wealth Planning and Design Financial will have the authority to execute transactions in the account without seeking Client approval on each transaction.

When deemed appropriate for the Client, Wealth Planning and Design may hire Sub-Advisors to manage all or a portion of the assets in the Client account. Wealth Planning and Design has full discretion to hire and fire Sub-Advisors as they deem suitable. Sub-Advisors will maintain the models or investment strategies agreed upon between Sub-Advisor and Wealth Planning and Design. Sub-Advisors execute trades on behalf of Wealth Planning and Design in Client accounts. Wealth Planning and Design will be responsible for the overall direct relationship with the Client. Wealth Planning and Design retains the authority to terminate the Sub-Advisor relationship at Wealth Planning and Design’s discretion.

Through a multiple step discovery process, Wealth Planning and Design obtains the necessary financial data from the Client and assists the Client in setting appropriate investment objectives for the Program account. Wealth Planning and Design obtains updated information from the Client during regularly scheduled Client performance reviews, as necessary in order to provide personalized investment advice to the Client.

The Client will be required to enter into a written agreement with Wealth Planning and Design in order to establish a Program account. The Client will also be required to complete an application with the broker/dealer that will act as custodian for Program account assets.

A Wrap Fee Program is an investment advisory program in which Clients pay one fee for both investment advisory services and the transaction costs in the account(s). The fee is bundled with Wealth Planning and Design’s costs for executing transactions in the account(s). This may result in a higher advisory fee to the Client. By participating in a wrap fee program, Clients may end up paying more or less than they would through a non-wrap fee program where a lower advisory fee may be charged, but trade execution costs are



passed directly through to the Client by the executing broker.

The Program Fee is not based directly upon the actual transaction or execution costs for the transactions within the account(s). Depending on the underlying investments in the Program and how much trading activity occurs, Clients may pay more or less than if they chose another advisory program that does not have a wrap fee, or if Clients chose to pay separately for all of the transaction costs (e.g., pay the advisory fee plus all transaction charges). Wealth Planning and Design offers both a Wrap Fee Program and a Non-Wrap Fee Program, therefore Wealth Planning and Design will review your investment options with Clients to determine the best offering for Clients. Similar services to those offered in the Program may be purchased from another unaffiliated financial services provider.

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### **Program Fees**

The annual investment advisory fee ("Annual Fee") schedule for the Program is described below. Wealth Planning and Design offers discretionary direct asset management services to advisory clients. Fees for these services will be based on a percentage of Assets Under Management at a rate of up to 2% annually.

The annual fee is negotiable based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with Clients, etc.).

Fees are billed quarterly in advance based on the amount of assets managed as of the close of business on the last business day of the previous quarter. If margin is utilized, the fees will be billed based on the net asset value of the account.

For accounts on the Adhesion Platform, the accounts will be billed as follows:

- On the first day of a billing period each investing account will incur a single, estimated investing services fee payable in advance for the billing period just commencing. The advance investing services fee for an investing account is based upon the value and allocations of the investing account on the first day of the billing period.
- On the last day of a billing period each investing account will incur a single, actual investing services fee payable in arrears for the billing period just ending. The actual investing services fee for an investing account is based upon the daily value and allocations of the investing account throughout the billing period. The actual investing services fee is then netted against the estimated investing services fee paid at the beginning of the billing period just ending, the difference of these two fees added to the estimated investing services fee for the billing period just commencing.
- For new investing accounts enrolled during the just completed billing period, the investing services fee shall be the sum of the actual investing services fee for the partial billing period just completed plus the estimated investing services fee for the billing period just commenced.

Lower fees for comparable services may be available from other sources. Clients may terminate their account within five (5) business days of signing the Investment Advisory Agreement with no obligation and without penalty. After the initial 5 business days, the agreement may be terminated by Wealth Planning and Design with thirty (30) days written notice to Client and by the Client at any time with written notice to Wealth Planning and Design. For accounts opened or closed mid-billing period, fees will be prorated based on the days services are provided during the given period. All unpaid earned fees will be due to



Wealth Planning and Design. Additionally, all unearned fees will be refunded to the Client. Client shall be given thirty (30) days prior written notice of any increase in fees. Any increase in fees will be acknowledged in writing by both parties before any increase in said fees occurs. Lower fees for comparable services may be available from other sources.

Wealth Planning and Design may also utilize the services of a Sub-Advisor to manage Clients' investment portfolios. Wealth Planning and Design will enter into Sub-Advisor agreements with other registered investment advisor firms. When using Sub-Advisors, the Client will not pay additional fees. The Sub-Advisors fees are inclusive of the fees charged by Wealth Planning and Design.

#### *Adhesion Wealth Advisor Solutions Platform*

From time to time, Wealth Planning and Design may also utilize the Adhesion Wealth Advisor Solutions platform to access programs and sub-advisors to manage clients' investment portfolios. When using sub-advisors on the Adhesion Platform, the client will not pay additional fees. The sub-advisor's fees are included in the fees charged by Wealth Planning and Design.

#### *Unified Managed Account Program*

Wealth Planning and Design through Adhesion offers discretionary investment management services in a managed account program through Overlay Portfolio Management (the "OPM Program"). This OPM Program may consist of using model portfolio advisers, model portfolios or other investment options such as mutual funds and/or exchange-traded funds ("ETFs") to represent different investment strategies for managing your account. Each of these investment strategies is designed to meet a specific goal.

Prior to investing in the OPM Program, you will execute a discretionary investment management agreement with us setting forth the terms and conditions of our management of your investments within the OPM Program. Depending on the management services the client selects, the client will grant us limited discretionary authority to manage the client account through selection of an overlay manager ("Overlay Manager"), third party strategist ("Strategist") and/or third party managers ("Managers"; collectively, "Third-Party Service Providers"). In addition, the client will authorize the custodian to follow our instructions as well as instructions given by Overlay Manager to effect transactions, deliver securities, deduct fees and take other actions with respect to the client account. The client will not have a direct contractual relationship with the Overlay Manager or any other Third-Party Service Provider.

The timing of trades in the client account will primarily depend upon the model or changes in the model and, generally, will not take into consideration how long a client may have held the position indicated by the model.

Wealth Planning and Design will retain the right to replace any Strategist or Manager on a discretionary basis. Depending on the service a client has selected, we will separately provide the client with the firm brochure (Part 2 of Form ADV) for the applicable Third-Party Service Provider(s) which includes information about their services, model portfolios, and investment strategies at or before the execution of our discretionary investment management agreement.



### *Tax Overlay Manager Services*

Tax overlay management services are available as an option for accounts utilizing the OPM Program through the Overlay Manager. If you elect tax overlay management services, the portion of your fee paid as the management fee on your account will increase. The Overlay Manager will develop a tax strategy for your account based on the information and instructions provided by us on your behalf. Tax overlay management services in an investment account offer benefits and limitations, as described below. The tax strategy developed for you by the Overlay Manager is provided solely in connection with your account and the Overlay Manager does not provide general tax planning services. If you do elect the tax overlay management services option, please consider the following:

The Tax Overlay Manager will implement tax overlay management services based on the information and instructions provided for your account(s).

The Tax Overlay Manager does not provide general tax advice, tax return preparation or tax planning services.

The Tax Overlay Manager will seek to reduce the overall tax burden of the account while seeking to maintain the risk and return characteristics of the model portfolios received from Strategists and/or Managers.

When providing tax overlay management services to the account, short-term gains are avoided where possible, but long-term gains are not limited unless you have requested a mandate to limit realized long-term gains.

The Overlay Manager will provide tax overlay management services with the assumption that the Overlay Manager will continue to provide services to the account for an entire tax year. The termination or removal of the overlay management services before the completion of an entire tax year may result in adverse tax consequences, including without limitation realization of short-term capital gains.

Regardless of your account size or any other factors, we strongly recommend that you continuously consult with a tax professional prior to and throughout the investing of your assets.

Additional deposits and withdrawals will be added or subtracted from account assets, as the case may be, which may lead to an adjustment of the Annual Fee. All Annual Fees are deducted from the account by the custodian unless other arrangements have been made in writing. The Annual Fee is paid to and retained by Wealth Planning and Design and the advisory representatives.

In addition to the Annual Fee, Clients may also incur certain charges imposed by third parties in connection with investments made through Program accounts, including those imposed by the custodian. These may include, but are not limited to, the following: mutual fund or money market 12b-1 fees, sub-transfer agent fees, certain deferred sales charges on previously purchased mutual funds transferred into the account, other transaction charges and service fees, IRA and qualified retirement plan fees, administrative fees, administrative servicing fees for trust accounts, creation and development fees or similar fees imposed by unit investment trust sponsors, managed futures investor servicing fees, and other charges required by law. Wealth Planning and Design does not receive any portion of these fees. Further information regarding charges and fees assessed by a mutual fund or variable annuity are available in the appropriate prospectus.

Mutual funds may also charge a redemption fee if a redemption is made within a specific time period following the investment. The terms of any redemption fee are disclosed in the



fund's prospectus. Transactions in mutual fund shares (e.g., for rebalancing, liquidations, deposits or tax harvesting) may be subject to a fund's frequent trading policy.

Client should be aware that margin borrowing involves additional risks. Margin borrowing will result in increased gain if the value of the securities in the account go up, but will result in increased losses if the account value decreases.

Since Wealth Planning and Design we will receive 100% of the fees paid for management of the wrap program, this may create an incentive to recommend that Clients participate in a wrap fee program rather than a non-wrap fee program (where Clients would pay for trade execution costs) or brokerage account where commissions are charged. This is because, in some cases, Wealth Planning and Design may stand to earn more compensation from advisory fees paid through a wrap fee program arrangement if Clients' accounts are not actively traded. As an investment philosophy, Wealth Planning and Design practices a nimble trading strategy that seeks to grow Client assets in up trends and protect principal during down trends.

## **Item 5: Account Requirements and Types of Clients**

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### **Account Minimum**

Wealth Planning and Design does not require a minimum to open an account.

### **Types of Clients**

Wealth Planning and Design generally provides investment advice to individuals, high net worth individuals, corporations or business entities.

Client relationships vary in scope and length of service.

## **Item 6: Portfolio Manager Selection and Evaluation**

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### **Portfolio Manager**

We are both the sponsor and portfolio manager of the wrap fee program.

When deemed appropriate for the client, Wealth Planning and Design may hire Sub-Advisors offered on the Adhesion platform to manage all or a portion of the assets in the client account. Sub-advisors and/or money manager(s) will maintain the models or investment strategies agreed upon between Sub-advisor and Wealth Planning and Design. By entering into the investment advisory agreement with Wealth Planning and Design, client gives Sub-advisor and money manager(s) discretionary authority to execute trades on behalf of Wealth Planning and Design in client accounts (as applicable). Wealth Planning and Design will be responsible for the overall direct relationship with the client. Wealth Planning and Design has full authority to hire and fire sub-advisors and/or money managers at Wealth Planning and Design's discretion.

### **Conflicts of Interest**

In establishing a Program account, Client elects to appoint TD Ameritrade Institutional, a Division of TD Ameritrade, Inc., member FINRA/SIPC as the sole and exclusive broker/dealer and custodian with respect to processing securities transactions for the Program account. Wealth Planning and Design does not maintain custody of Client assets.

Securities transactions for Program account are effected without commissions being charged to Client. While Wealth Planning and Design makes every attempt to obtain the best



execution possible, there is no assurance that it will be obtained. Clients should consider whether or not the appointment of TD Ameritrade as the sole broker/dealer and custodian may or may not result in certain costs or disadvantages to the Client as a result of possibly less favorable executions. In considering whether or not to restrict the execution of transactions through TD Ameritrade considered the capabilities of TD Ameritrade.

No agency-cross transactions or principal transactions are effected by Wealth Planning and Design in Program accounts.

Wealth Planning and Design may aggregate transactions for a Client with other Clients to improve the quality of execution. When transactions are so aggregated, the actual prices applicable to the aggregated transactions will be averaged, and the Client will be deemed to have purchased or sold its proportionate share of the securities involved at the average price obtained.

Advisor participates in the institutional advisor program (the "Program") offered by TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade Inc., member FINRA/SIPC ("TD Ameritrade"), an unaffiliated SEC-registered broker-dealer and FINRA member. TD Ameritrade offers to independent investment advisors services which include custody of securities, trade execution, clearance and settlement of transactions. Advisor receives some benefits from TD Ameritrade through its participation in the Program.

As disclosed above, Advisor participates in TD Ameritrade's institutional customer program and Advisor may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between Advisor's participation in the program and the investment advice it gives to its Clients, although Advisor receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving Advisor participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to Advisor by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by Advisor's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit Advisor but may not benefit its Client accounts. These products or services may assist Advisor in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help Advisor manage and further develop its business enterprise. The benefits received by Advisor or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to Clients, Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits by Advisor or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Advisor's choice of TD Ameritrade for custody and brokerage services.



The Program may cost the Client more or less than purchasing Program services separately. Factors that bear upon the cost of the Program account in relation to the cost of the same services purchased separately include: the type and size of the account, the historical and/or expected size or number of trades for the account, and the number and range of supplementary advisory and Client related services provided to the account.

The Annual Fee is an ongoing fee for investment advisory services and may cost the Client more than if the assets were held in a traditional brokerage account. In a brokerage account, a Client is charged a commission for each transaction and the representative has no duty to provide ongoing advice with respect to the account. If the Client plans to follow a buy and hold strategy for the account or does not wish to purchase ongoing investment advice or management services, the Client should consider opening a brokerage account rather than a Program account.

Wealth Planning and Design receives compensation as a result of the Client's participation in the Program. The amount of this compensation may be more or less than what Wealth Planning and Design would receive if the Client participated in other programs or paid separately for investment advice, brokerage and other Client services. Therefore, Wealth Planning and Design may have a financial incentive to recommend the Program account over other programs and services. Wealth Planning and Design acts as the portfolio manager for the Program and retains the management fee less execution costs. This may create a conflict of interest because Wealth Planning and Design may have a disincentive to trade securities in the account to keep the execution costs low therefore retaining a larger portion of the management fee.

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### **Advisory Business**

Wealth Planning and Design offers Clients an asset management account through the Program in which Wealth Planning and Design directs and manages Program assets for Client.

Client provided goals and objectives are documented in individual Client files. Investment strategies are created that reflect the stated goals and objective.

A Client may impose restrictions on a minimum level of cash they want in their account, as well as from which account they want their withdrawals to come. Also, a Client may issue restrictions on what specific securities or security types they do not want Wealth Planning and Design to buy or sell in their account.

Wealth Planning and Design also offers ERISA Services and Financial Planning and Consulting Services. These services are detailed in the firms Form ADV2A/2B brochure.

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### **Recommendations or Selections of Other Investment Advisors and Conflicts of Interest**

From time to time, Wealth Planning and Design may also utilize the services of a sub-adviser to manage clients' investment portfolios. Sub-advisors will maintain the models or investment strategies agreed upon between Sub-advisor and Wealth Planning and Design. Sub-advisors execute all trades on behalf of Wealth Planning and Design in client accounts. Wealth Planning and Design will be responsible for the overall direct relationship with the client. Wealth Planning and Design retains the authority to terminate the Sub-advisor relationship at Wealth Planning and Design's discretion.

Wealth Planning and Design is a Registered Investment Advisor which offers investment management on a discretionary basis.



In addition to the authority granted to Wealth Planning and Design under the Agreement, Client hereby grants Wealth Planning and Design full discretionary authority and authorizes Wealth Planning and Design to select and appoint one or more independent investment advisors (“Advisors”) to provide investment advisory services to Client without prior consultation with or the prior consent of Client. Such advisory services will be as determined by Wealth Planning and Design. Such Advisors shall have all of the same authority relating to the management of Client’s investment accounts as is granted to Wealth Planning and Design in the Agreement. In addition, as Wealth Planning and Design’s discretion, Wealth Planning and Design may grant such Advisors full authority to further delegate such discretionary investment authority to additional Advisors.

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**Client Tailored Services and Client Imposed Restrictions**

The goals and objectives for each Client are documented in our Client files. Investment strategies are created that reflect the stated goals and objectives. Clients may impose restrictions on investing in certain securities or types of securities. Agreements may not be assigned without written Client consent.

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**Sharing of Capital Gains**

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

Wealth Planning and Design does not use a performance-based fee structure because of the conflict of interest. Performance based compensation may create an incentive for Wealth Planning and Design to recommend an investment that may carry a higher degree of risk to the Client.

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**Methods of Analysis**

Security analysis methods may include fundamental analysis, technical analysis, charting, and cyclical analysis. Investing in securities involves risk of loss that Clients should be prepared to bear. Past performance is not a guarantee of future returns.

Fundamental analysis concentrates on factors that determine a company’s value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not take into account new patterns that emerge over time.

Charting analysis strategy involves using and comparing various charts to predict long and short term performance or market trends. The risk involved in using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. This may not be the case.

Cyclical analysis assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are twofold: 1) the markets do not always repeat cyclical patterns; and 2) if too many investors begin to implement this strategy, then it changes the very cycles these investors are trying to exploit.



The main sources of information include financial newspapers and magazines, annual reports, prospectuses, and filings with the Securities and Exchange Commission.

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### **General Investment Strategy**

The investment strategy for a specific Client is based upon the objectives stated by the Client during consultations. The Client may change these objectives at any time. Each Client executes an Investment Policy Statement, Risk Tolerance or similar form that documents their objectives and their desired investment strategy.

Other strategies may include long-term purchases and short-term purchases, trading, and option writing (including covered options, uncovered options or spreading strategies).

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### **Security Specific Material Risks**

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks and should discuss these risks with Wealth Planning and Design:

- *Market Risk:* The prices of securities in which Clients invest may decline in response to certain events taking place around the world, including those directly involving the companies whose securities are owned by a fund; conditions affecting the general economy; overall market changes; local, regional or global political, social or economic instability; and currency, interest rate and commodity price fluctuations. Investors should have a long-term perspective and be able to tolerate potentially sharp declines in market value.
- *Interest-rate Risk:* Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- *Inflation Risk:* When any type of inflation is present, a dollar today will buy more than a dollar next year, because purchasing power is eroding at the rate of inflation.
- *Currency Risk:* Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- *Reinvestment Risk:* This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- *Liquidity Risk:* Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- *Management Risk:* The advisor's investment approach may fail to produce the intended results. If the advisor's assumptions regarding the performance of a specific asset class or fund are not realized in the expected time frame, the overall performance of the Client's portfolio may suffer.
- *Equity Risk:* Equity securities tend to be more volatile than other investment choices. The value of an individual mutual fund or ETF can be more volatile than the market as a whole. This volatility affects the value of the Client's overall portfolio. Small and mid-cap companies are subject to additional risks. Smaller



companies may experience greater volatility, higher failure rates, more limited markets, product lines, financial resources, and less management experience than larger companies. Smaller companies may also have a lower trading volume, which may disproportionately affect their market price, tending to make them fall more in response to selling pressure than is the case with larger companies.

- *Fixed Income Risk:* The issuer of a fixed income security may not be able to make interest and principal payments when due. Generally, the lower the credit rating of a security, the greater the risk that the issuer will default on its obligation. If a rating agency gives a debt security a lower rating, the value of the debt security will decline because investors will demand a higher rate of return. As nominal interest rates rise, the value of fixed income securities held by a fund is likely to decrease. A nominal interest rate is the sum of a real interest rate and an expected inflation rate.
- *Investment Companies Risk:* When a Client invests in open end mutual funds or ETFs, the Client indirectly bears their proportionate share of any fees and expenses payable directly by those funds. Therefore, the Client will incur higher expenses, which may be duplicative. In addition, the Client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value or (ii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. Adviser has no control over the risks taken by the underlying funds in which Client invests.
- *Foreign Securities Risk:* Funds in which Clients invest may invest in foreign securities. Foreign securities are subject to additional risks not typically associated with investments in domestic securities. These risks may include, among others, currency risk, country risks (political, diplomatic, regional conflicts, terrorism, war, social and economic instability, currency devaluations and policies that have the effect of limiting or restricting foreign investment or the movement of assets), different trading practices, less government supervision, less publicly available information, limited trading markets and greater volatility. To the extent that underlying funds invest in issuers located in emerging markets, the risk may be heightened by political changes, changes in taxation, or currency controls that could adversely affect the values of these investments. Emerging markets have been more volatile than the markets of developed countries with more mature economies.
- *Long-term purchases:* Long-term investments are those vehicles purchased with the intension of being held for more than one year. Typically, the expectation of the investment is to increase in value so that it can eventually be sold for a profit. In addition, there may be an expectation for the investment to provide income. One of the biggest risks associated with long-term investments is volatility, the fluctuations in the financial markets that can cause investments to lose value.
- *Short-term purchases:* Short-term investments are typically held for one year or less. Generally there is not a high expectation for a return or an increase in value.



Typically, short-term investments are purchased for the relatively greater degree of principal protection they are designed to provide. Short-term investment vehicles may be subject to purchasing power risk — the risk that your investment's return will not keep up with inflation.

- *Trading risk:* Investing involves risk, including possible loss of principal. There is no assurance that the investment objective of any fund or investment will be achieved.
- *Options Trading:* The risks involved with trading options are that they are very time sensitive investments. An options contract is generally a few months. The buyer of an option could lose his or her entire investment even with a correct prediction about the direction and magnitude of a particular price change if the price change does not occur in the relevant time period (i.e., before the option expires). Additionally, options are less tangible than some other investments. An option is a "book-entry" only investment without a paper certificate of ownership.
- *Trading on Margin:* In a cash account, the risk is limited to the amount of money that has been invested. In a margin account, risk includes the amount of money invested plus the amount that has been loaned. As market conditions fluctuate, the value of marginable securities will also fluctuate, causing a change in the overall account balance and debt ratio. As a result, if the value of the securities held in a margin account depreciates, the Client will be required to deposit additional cash or make full payment of the margin loan to bring account back up to maintenance levels. Clients who cannot comply with such a margin call may be sold out or bought in by the brokerage firm.

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### **Proxy Voting**

Wealth Planning and Design does not vote proxies on securities. Clients are expected to vote their own proxies. The Client will receive their proxies directly from the custodian of their account or from a transfer agent.

When assistance on voting proxies is requested, Wealth Planning and Design will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client

## **Item 7: Client Information Provided to Portfolio Managers**

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### **Description**

Wealth Planning and Design obtains the necessary financial data from the Client and assists the Client in setting appropriate investment objectives for the Program account. Wealth Planning and Design obtains updated information from the Client as necessary in order to provide personalized investment advice to the Client. It is the Client's responsibility to inform Wealth Planning and Design of any changes in their stated objectives, financial situation, life circumstances or risk tolerance.

Client will be required to enter into a written agreement with Wealth Planning and Design in order to establish a Program account. Client will also be required to complete an application with the broker/dealer that will act as custodian for Program account assets.



## Item 8: Client Contact with Portfolio Managers

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### **Restrictions**

There are no restrictions placed on Clients' ability to contact and consult with the portfolio managers since Joni Rametta and Leonard Leetzow, Jr. are the portfolio managers.

## Item 9: Additional Information

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### **Disciplinary Information**

#### Criminal or Civil Actions

Wealth Planning and Design and its management have not been involved in any criminal or civil action.

#### Administrative Enforcement Proceedings

Wealth Planning and Design and its management have not been involved in administrative enforcement proceedings.

#### Self-Regulatory Organization Enforcement Proceedings

Wealth Planning and Design and its management have not been involved in legal or disciplinary events related to past or present investment Clients.

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### **Other Financial Industry Activities and Affiliations**

#### Broker-Dealer or Representative Registration

Wealth Planning and Design is not registered as a broker-dealer and no affiliated representatives of Wealth Planning and Design are registered representatives of a broker-dealer.

#### Futures or Commodity Registration

Wealth Planning and Design does not have an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

#### Material Relationships Maintained by this Advisory Business and Conflicts of Interest

Managing Members, Joni Rametta and Leonard Leetzow, Jr. are insurance agents with Wealth Planning and Design LLC. Approximately 10% of their time is spent on this activity. They will offer Clients services from this activity. As insurance agents, they may receive separate yet typical compensation.

This practice represents a conflict of interest because it gives an incentive to recommend products based on the commission amount received. This conflict is mitigated by disclosures, procedures and the firm's fiduciary obligation to place the best interest of the Client first and the Clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent of their choosing.

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### **Code of Ethics Description**

The employees of Wealth Planning and Design have committed to a Code of Ethics ("Code"). The purpose of our Code is to set forth standards of conduct expected of Wealth Planning and Design employees and addresses conflicts that may arise. The Code defines acceptable behavior for employees of Wealth Planning and Design. The Code reflects Wealth Planning and Design and its supervised persons' responsibility to act in the best interest of their Client.

One area the Code addresses is when employees buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our Clients. We do not allow any



employees to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our Clients.

Wealth Planning and Design's policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other employee, officer or director of Wealth Planning and Design may recommend any transaction in a security or its derivative to advisory Clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

Wealth Planning and Design's Code is based on the guiding principle that the interests of the Client are our top priority. Wealth Planning and Design's officers, directors, advisors, and other employees have a fiduciary duty to our Clients and must diligently perform that duty to maintain the complete trust and confidence of our Clients. When a conflict arises, it is our obligation to put the Client's interests over the interests of either employees or the company.

The Code applies to "access" persons. "Access" persons are employees who have access to non-public information regarding any Clients' purchase or sale of securities, or non-public information regarding the portfolio holdings of any reportable fund, who are involved in making securities recommendations to Clients, or who have access to such recommendations that are non-public.

Wealth Planning and Design will provide a copy of the Code of Ethics to any Client or prospective Client upon request.

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### **Investment Recommendations Involving a Material Financial Interest and Conflict of Interest**

Wealth Planning and Design and its employees do not recommend to Clients securities in which we have a material financial interest.

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### **Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest**

Wealth Planning and Design and its affiliated persons may buy or sell securities that are also held by Clients. In order to mitigate conflicts of interest such as trading ahead of Client transactions, affiliated persons are required to disclose all reportable securities transactions as well as provide Wealth Planning and Design with copies of their brokerage statements.

The Chief Compliance Officer of Wealth Planning and Design is Joni Rametta. She reviews all trades of the affiliated persons each quarter. The personal trading reviews ensure that the personal trading of affiliated persons does not affect the markets and that Clients of the firm receive preferential treatment over associated persons' transactions.

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### **Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest**

Wealth Planning and Design does not maintain a firm proprietary trading account and does not have a material financial interest in any securities being recommended and therefore no conflicts of interest exist. However, affiliated persons may buy or sell securities at the same time they buy or sell securities for Clients. In order to mitigate conflicts of interest such as front running, affiliated persons are required to disclose all reportable securities transactions as well as provide Wealth Planning and Design with copies of their brokerage statements.



The Chief Compliance Officer of Wealth Planning and Design is Joni Rametta. She reviews all trades of the affiliated persons each quarter. The personal trading reviews ensure that the personal trading of affiliated persons does not affect the markets and that Clients of the firm receive preferential treatment over associated persons' transactions.

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## **Review of Accounts**

### Schedule for Periodic Review of Client Accounts and Advisory Persons Involved

Account reviews are performed at least quarterly depending on the nature of the account and Client relationship. All reviews are conducted by Joni Rametta. Account reviews are performed more frequently when market conditions dictate.

### Review of Client Accounts on Non-Periodic Basis

Other conditions that may trigger a review of Clients' accounts are changes in the tax laws, new investment information, and changes in a Client's own situation.

### Content of Client Provided Reports and Frequency

Clients receive written account statements usually on a monthly basis, but no less than quarterly for managed accounts. Wealth Planning and Design will also provide Clients with quarterly performance reports.

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## **Client Referrals and Other Compensation**

### Economic Benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest

As disclosed above, Wealth Planning and Design participates in TD Ameritrade's institutional customer program and Wealth Planning and Design may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between Wealth Planning and Design's participation in the program and the investment advice it gives to its Clients, although Wealth Planning and Design receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving Wealth Planning and Design participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to Wealth Planning and Design by third party vendors.

TD Ameritrade may also have paid for business consulting and professional services received by Wealth Planning and Design's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit Wealth Planning and Design but may not benefit its Client accounts. These products or services may assist Wealth Planning and Design in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help Advisor manage and further develop its business enterprise. The benefits received by Advisor or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to Clients, Wealth Planning and Design endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits by Wealth



Planning and Design or its related persons in and of itself creates a conflict of interest and may indirectly influence the Wealth Planning and Design's choice of TD Ameritrade for custody and brokerage services.

Advisory Firm Payments for Client Referrals

Wealth Planning and Design does not compensate for Client referrals.

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**Financial Information**

Balance Sheet

A balance sheet is not required to be provided because Wealth Planning and Design does not serve as a custodian for Client funds or securities and Wealth Planning and Design does not require prepayment of fees of more than \$500 per Client and six months or more in advance.

Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet

Commitments to Clients

Wealth Planning and Design has no condition that is reasonably likely to impair our ability to meet contractual commitments to our Clients.

Bankruptcy Petitions during the Past Ten Years

Wealth Planning and Design has not had any bankruptcy petitions in the last ten years.



Item 1 Cover Page

**SUPERVISED PERSON BROCHURE**  
FORM ADV PART 2B

Joni Rametta, CFP®, MBA, CKA®



**Office Address:**  
6230 University Parkway  
Suite 305  
Sarasota, FL 34240

Tel: 941-361-1484

[ioni@wealthplanninganddesign.com](mailto:ioni@wealthplanninganddesign.com)

**Website:**  
[www.wealthplanninganddesign.com](http://www.wealthplanninganddesign.com)

This brochure supplement provides information about Joni Rametta and supplements the Wealth Planning and Design LLC brochure. You should have received a copy of that brochure. Please contact Joni Rametta if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Joni Rametta (CRD #1394160) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**FEBRUARY 27, 2021**



## Brochure Supplement (Part 2B of Form ADV)

### Supervised Person Brochure

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#### Principal Executive Officer – Joni Rametta, CFP®, MBA, CKA®

- Year of birth: 1960
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#### Item 2 - Educational Background and Business Experience

##### Educational Background:

- Indiana Wesleyan University; Master of Business Administration; 2017
- University of Central Florida; Bachelor of Business Administration; 1982
- Manatee Community College; Associate Degree; 1980

##### Business Experience:

- Wealth Planning and Design LLC; Investment Advisor Representative/Insurance Agent; 01/2016-Present
- Wealth Planning and Design LLC; Managing Member/Chief Compliance Officer; 12/2019-Present
- Leetzow Group LLC; Managing Member; 01/2013-Present
- College Planning and Design, LLC; Managing Member; 05/2019-Present
- Wealth Planning and Design LLC; Managing Member; 04/2015-05/2019
- Nepsis Advisor Services, Inc.; Investment Advisor Representative; 10/2012-03/2016
- Morgan Stanley; Investment Advisor Representative/Registered Representative; 06/2009-10/2012
- CitiGroup Global Markets Inc.; Registered Representative; 07/1993-06/2009
- Lehman Brothers Inc.; Investment Advisor Representative/Registered Representative; 07/1987-07/1993
- E.F. Hutton & Company Inc; Investment Advisor Representative/Registered Representative; 08/1985-07/1987

#### Professional Certifications

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*Joni Rametta* has earned certifications and credentials that are required to be explained in further detail.

**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.

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 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.

**Certified Kingdom Advisor® (CKA):** The CKA® is a designation granted by Kingdom Advisors, Inc. to individuals who have demonstrated themselves to be able to apply biblical wisdom in counsel, technically competent, ethical, accountable, and a biblical steward.

Prerequisites: All candidates must sign a "Statement of Faith," obtain a letter of reference from pastor or member of pastoral staff, a signed statement of personal stewardship and two Client references.

Additional prerequisites vary by discipline:

- Accountant: CPA, EA
- Attorney: JD
- Financial Planner: CFP®, ChFC® or CPA/PFS designation or have 10 years of full-time financial-planning experience.
- Insurance Professional: CLU® or 10 years of full-time experience practicing with Clients in this discipline
- Investment Professional: CFP®, ChFC®, CPA/PFS, CFA, CIMA, AAMS designation or have 10 years of full-time experience practicing with Clients in this discipline.

Education requirements: Complete Kingdom Advisors Core Training and successfully pass a final certification exam.

Continuing Education requirements: 10 hours per year.



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**Item 3 - Disciplinary Information**

- A. Ms. Rametta has never been involved in a criminal or civil action in a domestic, foreign or military court of competent jurisdiction for which she:
  - 1. Was convicted of, or pled guilty or nolo contendere ("no contest") to (a) any felony; (b) misdemeanor that involved investments or an investment-related business, fraud, false statement or omissions, wrongful taking of property, bribery, perjury, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;
  - 2. Is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;
  - 3. Was found to have been involved in a violation of an investment-related statute or regulation; or
  - 4. Was the subject of any order, judgement or decree permanently or temporarily enjoining, or otherwise limiting, him from engaging in any investment related activity, or from violating any investment-related statute, rule, or order.
- B. Ms. Rametta never had an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which she:
  - 1. Was found to have caused an investment-related business to lose its authorization to do business; or the subject of an order by the agency or authority;
  - 2. Was found to have been involved in a violation of an investment-related statute or regulation or was the subject of an order by the agency or authority (a) denying, suspending or revoking the authorization of the supervised person to act in an investment-related business; (b) barring or suspending his association with an investment-related business; (c) otherwise significantly limiting his investment-related activities; or (d) imposing a civil money penalty of more than \$2,500 on him.
- C. Ms. Rametta has never been the subject of a self-regulatory organization (SRO) proceeding in which she:
  - 1. Was found to have caused an investment-related business to lose its authorization to do business; or
  - 2. Was found to have been involved in a violation of the SRO's rules and was: (a) barred or suspended from membership or from association with other members, or was expelled from membership; (b) otherwise significantly limited from investment-related activities; or (c) fined more than \$2,500.
- D. Ms. Rametta has not been involved in Any other hearing or formal adjudication in which a professional attainment, designation, or license of the supervised person was revoked or suspended because of a violation of rules relating to professional conduct.

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**Item 4 - Other Business Activities**

Managing Member, Joni Rametta is an insurance agent with Wealth Planning and Design LLC. Approximately 10% of her time is spent on this activity. She will offer Clients services from this activity. As an insurance agent, she may receive separate yet typical compensation.

In addition, Ms. Rametta is the managing member for College Planning and Design, LLC, an affiliated company where she offers access ACT and SAT test preparation services and assisting in planning for future tuition expenses. Approximately 20% of her time is spent on



this activity. She will offer Clients services from this activity and will receive separate yet typical compensation.

These practices represent a conflict of interest because it gives an incentive to recommend products based on the commission or fee amount received. This conflict is mitigated by disclosures, procedures and the firm's fiduciary obligation to place the best interest of the Client first and the Clients are not required to purchase any products or services. Clients have the option to purchase these products or services through another insurance agent or managing member of their choosing.

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**Item 5 - Additional Compensation**

Joni Rametta receives commissions on the insurance she sells. She does not receive any performance-based fees.

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**Item 6 - Supervision**

Since Joni Rametta is the Chief Compliance Officer of Wealth Planning and Design she is solely responsible for all supervision and formulation and monitoring of investment advice offered to Clients. She will adhere to the policies and procedures as described in the firm's Compliance Manual. She can be reached at [joni@wealthplanningnanddesign.com](mailto:joni@wealthplanningnanddesign.com) or 941-361-1484.



Item 1 Cover Page

**SUPERVISED PERSON BROCHURE**  
FORM ADV PART 2B

Leonard Leetzow, Jr.



**Office Address:**  
6230 University Parkway  
Suite 305  
Sarasota, FL 34240

Tel: 941-361-1484

[ioni@wealthplanninganddesign.com](mailto:ioni@wealthplanninganddesign.com)

**Website:**  
[www.wealthplanninganddesign.com](http://www.wealthplanninganddesign.com)

This brochure supplement provides information about Leonard Leetzow, Jr. and supplements the Wealth Planning and Design LLC brochure. You should have received a copy of that brochure. Please contact Leonard Leetzow, Jr. if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Leonard Leetzow, Jr. (CRD #305671) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**FEBRUARY 27, 2021**



## **Brochure Supplement (Part 2B of Form ADV)**

### **Supervised Person Brochure**

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#### **Principal Executive Officer – Leonard Leetzow, Jr.**

- Year of birth: 1938
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#### **Item 2 - Educational Background and Business Experience**

##### **Educational Background:**

- Naval Academy; Attended 1958-1959

##### **Business Experience:**

- Wealth Planning and Design LLC; Investment Advisor Representative/Insurance Agent; 12/2015-Present
  - Wealth Planning and Design LLC; Managing Member; 12/2019-Present
  - Leetzow Group LLC; Managing Member; 01/2013-Present
  - Nepsis Advisor Services, Inc.; Investment Advisor Representative; 10/2012-03/2016
  - Morgan Stanley; Investment Advisor Representative/Registered Representative; 06/2009-10/2012
  - CitiGroup Global Markets Inc.; Registered Representative; 07/1993-06/2009
  - Lehman Brothers Inc.; Investment Advisor Representative/Registered Representative; 11/1977-07/1993
  - Shearson Hayden Stone Inc.; Investment Advisor Representative/Registered Representative; 11/1974-11/1977
  - Shearson, Hammill & Co., Incorporated; Investment Advisor Representative/Registered Representative; 04/1965-11/1974
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#### **Item 3 - Disciplinary Information**

- A. Mr. Leetzow has never been involved in a criminal or civil action in a domestic, foreign or military court of competent jurisdiction for which he:
5. Was convicted of, or pled guilty or nolo contendere ("no contest") to (a) any felony; (b) misdemeanor that involved investments or an investment-related business, fraud, false statement or omissions, wrongful taking of property, bribery, perjury, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;
  6. Is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;
  7. Was found to have been involved in a violation of an investment-related statute or regulation; or
  8. Was the subject of any order, judgement or decree permanently or temporarily enjoining, or otherwise limiting, him from engaging in any investment related activity, or from violating any investment-related statute, rule, or order.
- B. Mr. Leetzow never had an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which he:
3. Was found to have caused an investment-related business to lose its authorization to do business; or the subject of an order by the agency or authority;



4. Was found to have been involved in a violation of an investment-related statute or regulation or was the subject of an order by the agency or authority
  - (a) denying, suspending or revoking the authorization of the supervised person to act in an investment-related business; (b) barring or suspending his association with an investment-related business; (c) otherwise significantly limiting his investment-related activities; or (d) imposing a civil money penalty of more than \$2,500 on him.
- C. Mr. Leetzow has never been the subject of a self-regulatory organization (SRO) proceeding in which he:
  3. Was found to have caused an investment-related business to lose its authorization to do business; or
  4. Was found to have been involved in a violation of the SRO's rules and was: (a) barred or suspended from membership or from association with other members, or was expelled from membership; (b) otherwise significantly limited from investment-related activities; or (c) fined more than \$2,500.
- D. Mr. Leetzow has not been involved in Any other hearing or formal adjudication in which a professional attainment, designation, or license of the supervised person was revoked or suspended because of a violation of rules relating to professional conduct.

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**Item 4 - Other Business Activities**

Managing Member, Leonard Leetzow, Jr. is an insurance agent with Wealth Planning and Design LLC. Approximately 10% of their time is spent on this activity. He will offer Clients services from this activity. As an insurance agent, he may receive separate yet typical compensation.

This practice represents a conflict of interest because it gives an incentive to recommend products based on the commission amount received. This conflict is mitigated by disclosures, procedures and the firm's fiduciary obligation to place the best interest of the Client first and the Clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent of their choosing.

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**Item 5 - Additional Compensation**

Leonard Leetzow receives commissions on the insurance he sells. He does not receive any performance-based fees.

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**Item 6 - Supervision**

Joni Rametta is the Chief Compliance Officer of Wealth Planning and Design. Ms. Rametta reviews Mr. Leetzow's work through Client account reviews and quarterly personal transaction reports, as well as face-to-face and phone interactions. Ms. Rametta can be reached at [joni@wealthplanningnanddesign.com](mailto:joni@wealthplanningnanddesign.com) or 941-361-1484.