

FORM ADV PART 2A DISCLOSURE 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

FEBRUARY 27, 2021

Item 2: Material Changes

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.

Material Changes since the Last Update

This update is in accordance with the required annual update for Registered Investment Advisors. Since the last filing of this brochure on April 29, 2020, the following material changes have occurred:

- Item 4 has been updated to reflect a current asset under management calculation.
-

Full Brochure Available

This Firm Brochure being delivered is the complete brochure for the Firm.

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Item 4: Advisory Business

Firm Description

Wealth Planning and Design LLC (“Wealth Planning and Design”) was founded in April 2015 and became registered to offer advisory services in November 2015. Leetzow Group LLC is 100% owner. Leetzow Group LLC is co-owned by Joni Rametta and Leonard Leetzow, Jr.

Types of Advisory Services

ASSET MANAGEMENT

ABC offers discretionary asset management services to advisory Clients. ABC will offer Clients ongoing asset management services through determining individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, asset allocation, portfolio monitoring and the overall investment program will be based on the above factors. The Client will authorize ABC discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement.

In addition, Wealth Planning and Design offer additional asset management services through their sponsored Wrap Program. Please see Form ADV2A, Appendix 1 for additional details.

ERISA PLAN SERVICES

Wealth Planning and Design provides service to qualified retirement plans including 401(k) plans, 403(b) plans, pension and profit-sharing plans, cash balance plans, and deferred compensation plans. Wealth Planning and Design may act as a 3(21) advisor:

Limited Scope ERISA 3(21) Fiduciary. Wealth Planning and Design may serve as a limited scope ERISA 3(21) fiduciary that can advise, help and assist plan sponsors with their investment decisions on a non-discretionary basis. As an investment advisor Wealth Planning and Design has a fiduciary duty to act in the best interest of the Client. The plan sponsor is still ultimately responsible for the decisions made in their plan, though using Wealth Planning and Design can help the plan sponsor delegate liability by following a diligent process.

1. Fiduciary Services are:

- Provide non-discretionary investment advice to the Client about asset classes and investment alternatives available for the Plan in accordance with the Plan’s investment policies and objectives. Client will make the final decision regarding the initial selection, retention, removal and addition of investment options. Wealth Planning and Design acknowledges that it is a fiduciary as defined in ERISA section 3 (21) (A) (ii).
- Assist the Client in the development of an investment policy statement (“IPS”). The IPS establishes the investment policies and objectives for the Plan. Client shall have the ultimate responsibility and authority to establish such policies and objectives and to adopt and amend the IPS.
- Provide non-discretionary investment advice to the Plan Sponsor with respect to the selection of a qualified default investment alternative for participants who are

automatically enrolled in the Plan or who have otherwise failed to make investment elections. The Client retains the sole responsibility to provide all notices to the Plan participants required under ERISA Section 404(c) (5) and 404(a)-5.

- Assist in monitoring investment options by preparing periodic investment reports that document investment performance, consistency of fund management and conformance to the guidelines set forth in the IPS and make recommendations to maintain, remove or replace investment options.
- Meet with Client on a periodic basis to discuss the reports and the investment recommendations.

2. Non-fiduciary Services are:

- Assist in the education of Plan participants about general investment information and the investment alternatives available to them under the Plan. Client understands Wealth Planning and Design's assistance in education of the Plan participants shall be consistent with and within the scope of the Department of Labor's definition of investment education (Department of Labor Interpretive Bulletin 96-1). As such, Wealth Planning and Design is not providing fiduciary advice as defined by ERISA 3(21)(A)(ii) to the Plan participants. Wealth Planning and Design will not provide investment advice concerning the prudence of any investment option or combination of investment options for a particular participant or beneficiary under the Plan.
- Assist in the group enrollment meetings designed to increase retirement plan participation among the employees and investment and financial understanding by the employees.

Wealth Planning and Design may provide these services or, alternatively, may arrange for the Plan's other providers to offer these services, as agreed upon between Wealth Planning and Design and Client.

3. Wealth Planning and Design has no responsibility to provide services related to the following types of assets ("Excluded Assets"):

- Employer securities;
- Real estate (except for real estate funds or publicly traded REITs);
- Stock brokerage accounts or mutual fund windows;
- Participant loans;
- Non-publicly traded partnership interests;
- Other non-publicly traded securities or property (other than collective trusts and similar vehicles); or
- Other hard-to-value or illiquid securities or property.

Excluded Assets will **not** be included in calculation of Fees paid to Wealth Planning and Design on the ERISA Agreement. Specific services will be outlined in detail to each plan in the 408(b)2 disclosure.

FINANCIAL PLANNING AND CONSULTING

If financial planning services are applicable, a comprehensive evaluation of an investor's current and future financial state will be provided by using currently known variables to

predict future cash flows, asset values and withdrawal plans. Wealth Planning and Design will use current net worth, tax liabilities, asset allocation, and future retirement and estate plans in developing financial plans.

Typical topics reviewed in a financial plan may include but are not limited to:

- **Financial goals:** Based on an individual's or a family's clearly defined financial goals, including funding a college education for the children, buying a larger home, starting a business, retiring on time or leaving a legacy. Financial goals should be quantified and set to milestones for tracking.
- **Personal net worth statement:** A snapshot of assets and liabilities serves as a benchmark for measuring progress towards financial goals.
- **Cash flow analysis:** An income and spending plan determines how much can be set aside for debt repayment, savings and investing each month.
- **Retirement strategy:** A strategy for achieving retirement independent of other financial priorities. Including a strategy for accumulating the required retirement capital and its planned lifetime distribution.
- **Comprehensive risk management plan:** Identify all risk exposures and provide the necessary coverage to protect the family and its assets against financial loss. The risk management plan includes a full review of life and disability insurance, personal liability coverage, property and casualty coverage, and catastrophic coverage.
- **Long-term investment plan:** Include a customized asset allocation strategy based on specific investment objectives and a risk profile. This investment plan sets guidelines for selecting, buying and selling investments and establishing benchmarks for performance review.
- **Tax reduction strategy:** Identify ways to minimize taxes on personal income to the extent permissible by the tax code. The strategy should include identification of tax-favored investment vehicles that can reduce taxation of investment income.
- **Estate preservation:** Help update accounts, review beneficiaries for retirement accounts and life insurance, provide a second look at your current estate planning documents, and prompt you to update your plan when the legal environment changes or you have major life events such as a marriage, death, or births.

If a conflict of interest exists between the interests of Wealth Planning and Design and the interests of the Client, the Client is under no obligation to act upon Wealth Planning and Design's recommendation. If the Client elects to act on any of the recommendations, the Client is under no obligation to effect the transaction through Wealth Planning and Design. Financial plans will be completed and delivered inside of ninety (90) days contingent upon timely delivery of all required documentation.

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.

Wrap Fee Programs

Wealth Planning and Design does sponsor a wrap fee program. Please see Appendix 1 of this brochure for more details.

Client Assets under Management

As-of December 31, 2020, Wealth Planning and Design has \$93,900,000 in discretionary Client assets under management and \$0 in non-discretionary Client assets under management.

Item 5: Fees and Compensation

Method of Compensation and Fee Schedule**ASSET MANAGEMENT**

Wealth Planning and Design offers discretionary direct asset management services to advisory Clients. Wealth Planning and Design charges an annual investment advisory fee based on the total assets under management of up to 1.5%.

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. 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.

ERISA PLAN SERVICES

The annual fees are based on the market value of the Included Assets and will not exceed 1%. The annual fee is negotiable and will be charged as a percentage of the Included Assets. Fees may be charged quarterly or monthly in arrears or in advance based on the assets as calculated by the custodian or record keeper of the Included Assets (without adjustments for anticipated withdrawals by Plan participants or other anticipated or scheduled transfers or distribution of assets). If the services to be provided start any time other than the first day of a quarter or month, the fee will be prorated based on the number of days remaining in the quarter or month. If this Agreement is terminated prior to the end of the billing cycle, Wealth Planning and Design shall be entitled to a prorated fee based on the number of days during the fee period services were provided or Client will be due a prorated refund of fees for days services were not provided in the billing cycle.

The fee schedule, which includes compensation of Wealth Planning and Design for the services is described in detail in Schedule A of the ERISA Plan Agreement. The Plan is obligated to pay the fees; however, the Plan Sponsor may elect to pay the fees. Client may elect to be billed directly or have fees deducted from Plan Assets. Wealth Planning and Design does not reasonably expect to receive any additional compensation, directly or indirectly, for its services under this Agreement. If additional compensation is received, Wealth Planning and Design will disclose this compensation, the services rendered, and the payer of compensation. Wealth Planning and Design will offset the compensation against the fees agreed upon under the Agreement.

FINANCIAL PLANNING AND CONSULTING

Wealth Planning and Design charges a fixed fee for financial planning. Prior to the planning process the Client will be provided an estimated plan fee. Services are completed and delivered inside of ninety (90) days contingent upon timely delivery of all required documentation. Client may cancel within five (5) business days of signing Agreement with no obligation and without penalty. If the Client cancels after five (5) business days, any unearned fees will be refunded to the Client, or any unpaid earned fees will be due to Wealth Planning and Design.

FIXED FEES

Financial Planning Services are offered based on a flat fee between \$250 and \$5,000.

Fees for financial plans are:

Billed either 100% upon commencement of the Advisory Agreement or 50% in advance with the balance due upon plan delivery. This will be detailed in the Advisory Agreement.

Client Payment of Fees

Investment management fees are billed quarterly in advance, meaning that we invoice you before the billing period. Fees are usually deducted from a designated Client account to facilitate billing. The Client must consent in advance to direct debiting of their investment account.

Fees for ERISA 3(21) services may be billed in advance.

Fees for financial plans are:

Billed either upon commencement of the Advisory Agreement or 50% in advance with the balance due upon plan delivery as detailed in the Advisory Agreement.

Wealth Planning and Design, in its sole discretion, may charge a lesser investment advisory fee 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.).

Additional Client Fees Charged

Custodians may charge transaction fees on purchases or sales of certain mutual funds, equities, and exchange-traded funds. These charges may include mutual fund transaction fees, postage and handling, margin interest and miscellaneous fees.

For more details on the brokerage practices, see Item 12 of this brochure.

Prepayment of Client Fees

Wealth Planning and Design does not require any prepayment of fees of more than \$500 per Client and six months or more in advance.

Fees for ERISA 3(21) and/or 3(38) services may be billed in advance.

Fees for financial plans are billed either at the commencement of the contract or 50% in advance with the balance due upon plan delivery as outlined in the Advisory Agreement.

Investment management fees are billed quarterly in advance.

If the Client cancels after five (5) business days, any unearned fees will be refunded to the Client, or any unpaid earned fees will be due to Wealth Planning and Design.

External Compensation for the Sale of Securities to Clients

Investment Advisor Representatives of Wealth Planning and Design receive external compensation sales of investment related products such as insurance as licensed insurance agents. From time to time, they will offer clients services from those activities. More than 10% of Ms. Rametta's compensation is from external compensation and more than 10% is from Mr. Leetzow's compensation is from external compensation.

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

Item 6: Performance-Based Fees and Side-by-Side Management

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.

Item 7: Types of Clients

Description

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.

Account Minimums

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

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

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.

TPMs utilized by Wealth Planning and Design may use various methods of analysis to determine the proper strategy for the client referred and these will be disclosed in the TPM's Form ADV Part 2. Investing in securities involves risk of loss that clients should be prepared to bear. Past performance is not a guarantee of future returns. Other strategies utilized by TPMs may include long-term purchases, short-term purchases, trading, and option writing (including covered options, uncovered options or spreading strategies).

In developing a financial plan for a Client, Wealth Planning and Design's analysis may include cash flow analysis, investment planning, risk management, tax planning and estate planning. Based on the information gathered, a detailed strategy is tailored to the Client's specific situation.

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

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 by providing written notice to Wealth Planning and Design. Each Client executes a Client

profile form or similar form that documents their objectives and their desired investment strategy.

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

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 delisted 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 intention 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.

The risks associated with utilizing TPM’s include:

- Manager Risk
 - TPM fails to execute the stated investment strategy
- Business Risk
 - TPM has financial or regulatory problems
- The specific risks associated with the portfolios of the TPM’s which is disclosed in the TPM’s Form ADV Part 2.

Item 9: 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 that are material to a Client’s or prospective Client’s evaluation of Wealth Planning and Design or the integrity of its management.

Item 10: 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

Neither Wealth Planning and Design nor its affiliated representatives are registered or 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.

Recommendations or Selections of Other Investment Advisors and Conflicts of Interest

When selecting a TPM, the Client's best interest will be the main determining factor of Wealth Planning and Design. Wealth Planning and Design ensures that before selecting other advisors for Client that the other advisors are properly licensed or registered as an investment advisor.

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

Code of Ethics Description

The affiliated persons (affiliated persons include employees and/or independent contractors) 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 affiliated persons and addresses conflicts that may arise. The Code defines acceptable behavior for affiliated persons 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 which the Code addresses is when affiliated persons buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our Clients. We do not allow any affiliated persons 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 affiliated person, 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 affiliated persons 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 affiliated persons or the company.

The Code applies to "access" persons. "Access" persons are affiliated persons 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.

Investment Recommendations Involving a Material Financial Interest and Conflict of Interest

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

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.

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.

Item 12: Brokerage Practices

Factors Used to Select Broker-Dealers for Client Transactions

Wealth Planning and Design may recommend the use of a particular broker-dealer such as TD Ameritrade Institutional is a Division of TD Ameritrade, Inc., Member FINRA/SIPC ("TD Ameritrade"), an unaffiliated SEC-registered broker-dealer and FINRA member. Wealth Planning and Design will select appropriate brokers based on a number of factors including but not limited to their relatively low transaction fees and reporting ability. Wealth Planning and Design relies on its broker to provide its execution services at the best prices available. Lower fees for comparable services may be available from other sources. Clients pay for any and all custodial fees in addition to the advisory fee charged by Wealth Planning and Design.

Wealth Planning and Design participates in the TD Ameritrade Institutional program. TD Ameritrade is an independent SEC-registered broker-dealer and is not affiliated with Wealth Planning and Design. TD Ameritrade offers to independent investment Advisors services which include custody of securities, trade execution, clearance and settlement of transactions. Wealth Planning and Design receives some benefits from TD Ameritrade through its participation in the program. (Please see the disclosure under Item 14)

Any TD Ameritrade account maintained on the Institutional platform that is under transactional based pricing is subject to the same zero commissions as retail clients.

Although TD Ameritrade recently reduced their online equity trade commissions to zero, it only applies to U.S. exchange listed stocks, ETFs and options trades. TD Ameritrade still charges a per contract fee (\$0.65) and transaction fees for Mutual Funds which could be charged the advisor's sundry account should they choose to remain in the Wrap Fee program.

- *Directed Brokerage*
Wealth Planning and Design does not allow directed brokerage accounts.
- *Brokerage for Client Referrals*
Wealth Planning and Design does not receive client referrals from any custodian or third party in exchange for using that broker-dealer or third party.
- *Best Execution*
Investment advisors who manage or supervise Client portfolios have a fiduciary obligation of best execution. The determination of what may constitute best execution and price in the execution of a securities transaction by a broker involves a number of considerations and is subjective. Factors affecting brokerage selection include the overall direct net economic result to the portfolios, the efficiency with

which the transaction is affected, the ability to effect the transaction where a large block is involved, the operational facilities of the broker-dealer, the value of an ongoing relationship with such broker and the financial strength and stability of the broker. Wealth Planning and Design does not receive any portion of the trading fees.

- *Soft Dollar Arrangements*

The Securities and Exchange Commission defines soft dollar practices as arrangement under which products or services other than execution services are obtained by Wealth Planning and Design from or through a broker-dealer in exchange for directing Client transactions to the broker-dealer. As permitted by Section 28(e) of the Securities Exchange Act of 1934, Wealth Planning and Design receives economic benefits as a result of commissions generated from securities transactions by the broker-dealer from the accounts of Wealth Planning and Design. These benefits include both proprietary research from the broker and other research written by third parties.

A conflict of interest exists when Wealth Planning and Design receives soft dollars. This conflict is mitigated by the fact that Wealth Planning and Design has a fiduciary responsibility to act in the best interest of its Clients and the services received are beneficial to all Clients.

Wealth Planning and Design utilizes the services of custodial broker dealers. Economic benefits are received by Wealth Planning and Design which would not be received if Wealth Planning and Design did not give investment advice to Clients. These benefits include: A dedicated trading desk, a dedicated service group and an account services manager dedicated to Wealth Planning and Design's accounts, ability to conduct "block" Client trades, electronic download of trades, balances and positions, duplicate and batched Client statements, and the ability to have advisory fees directly deducted from Client accounts.

Aggregating Securities Transactions for Client Accounts

Wealth Planning and Design manages each account separately, and therefore, does not aggregate purchases and sales and other transactions. If orders are not aggregated, some clients purchasing securities around the same time may receive a less favorable price than other clients which may cost clients more money.

Item 13: Review of Accounts

Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved

Account reviews are performed quarterly by the Chief Compliance Officer of Wealth Planning and Design. Account reviews are performed more frequently when market conditions dictate. Reviews of Client accounts include, but are not limited to, a review of Client documented risk tolerance, adherence to account objectives, investment time horizon, and suitability criteria, reviewing target bans of each asset class to identify if there is an opportunity for rebalancing, and reviewing accounts for tax loss harvesting opportunities.

Financial plans generated are updated as requested by the Client and pursuant to a new or amended agreement, Wealth Planning and Design suggests updating at least annually.

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 no less than quarterly for managed accounts. Account statements are issued by Wealth Planning and Design's custodian. Client receives confirmations of each transaction in account from Custodian and an additional statement during any month in which a transaction occurs. Performance reports will be provided by Wealth Planning and Design at least quarterly to Clients with assets under management, exclusive of Assets Held Away.

Item 14: Client Referrals and Other Compensation

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

As disclosed under Item 12 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 Wealth Planning and Design manage and further develop its business enterprise. The benefits received by Wealth Planning and Design 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.

Item 15: Custody

Account Statements

All assets are held at qualified custodians, which means the custodians provide account statements directly to Clients at their address of record at least quarterly. Clients are urged to compare the account statements received directly from their custodians to any documentation or reports prepared by Wealth Planning and Design.

Wealth Planning and Design is deemed to have limited custody solely because advisory fees are directly deducted from Client's accounts by the custodian on behalf of Wealth Planning and Design.

Wealth Planning and Design is also deemed to have limited custody due to its Third-Party Standing Letters of Authorization ("SLOA").

Wealth Planning and Design and its qualified custodian meet the following seven (7) conditions in order to avoid maintaining full custody and be subject to the surprise exam requirement:

1. The Client provides an instruction to the qualified custodian, in writing, that includes the Client's signature, the third party's name, and either the third party's address or the third party's account number at a custodian to which the transfer should be directed.
2. The Client authorizes Wealth Planning and Design, in writing, either on the qualified custodian's form or separately, to direct transfers to the third party either on a specified schedule or from time to time.
3. The Client's qualified custodian performs appropriate verification of the instruction, such as a signature review or other method to verify the Client's authorization and provides a transfer of funds notice to the Client promptly after each transfer.
4. The Client has the ability to terminate or change the instruction to the Client's qualified custodian.
5. Wealth Planning and Design has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the Client's instruction.
6. Wealth Planning and Design maintains records showing that the third party is not a related party nor located at the same address as Wealth Planning and Design.

The Client's qualified custodian sends the Client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

Item 16: Investment Discretion

Discretionary Authority for Trading

ABC requires discretionary authority to manage securities accounts on behalf of Clients. ABC has the authority to determine, without obtaining specific Client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. The client will authorize ABC discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement.

Wealth Planning and Design allows Client's to place certain restrictions, as outlined in the Client's Investment Policy Statement or similar document. Such restrictions could include only allowing purchases of socially conscious investments. These restrictions must be provided to Wealth Planning and Design in writing.

Wealth Planning and Design does not receive any portion of the transaction fees or commissions paid by the Client to the custodian.

Item 17: Voting Client Securities

Proxy Votes

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 18: 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

joni@wealthplanninganddesign.com

Website:

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.

FEBRUARY 27, 2021

Brochure Supplement (Part 2B of Form ADV)

Supervised Person Brochure

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

- Year of birth: 1960
-

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
- Leetow Group LLC; Managing Member; 01/2013-Present
- College Planning and Design, LLC; Managing Member; 05/2019-Present
- Wealth Planning and Design LLC; Managing Member/Chief Compliance Officer; 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.; Investment Advisor Representative/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

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.

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.
-

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.

Item 5 - Additional Compensation

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

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 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

loni@wealthplanninganddesign.com

Website:

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.

FEBRUARY 27, 2021

Brochure Supplement (Part 2B of Form ADV)

Supervised Person Brochure

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.; Investment Advisor Representative/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
-

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:
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. 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:
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. Mr. Leetzow has never been the subject of a self-regulatory organization (SRO) proceeding in which he:
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. 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.

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.

Item 5 - Additional Compensation

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

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@wealthplanninganddesign.com or 941-361-1484.