



## **Van Leeuwen Retirement and Investment Services Retirement and Investment Services**

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

**Effective: January 14, 2021**

This Form ADV Part 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Van Leeuwen Retirement and Investment Services Retirement and Investment Services (“Van Leeuwen Retirement and Investment Services” or the “Advisor”). If you have any questions about the contents of this Disclosure Brochure, please contact us at (859) 626-3400 or by email at [mark.vanleeuwen@lpl.com](mailto:mark.vanleeuwen@lpl.com).

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

Additional information about Van Leeuwen Retirement and Investment Services and its advisory persons are available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching for our firm name or by our CRD# 289463.

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## Item 2 – Material Changes

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Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about advisory personnel of Van Leeuwen Retirement and Investment Services. For convenience, we have combined these documents into a single disclosure document.

### Material Changes

There have been [no] material changes to this Disclosure Brochure since the last filing and distribution to Clients.

### Future Changes

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

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching for our firm name or by our CRD# 289463. You may also request a copy of this Disclosure Brochure at any time, by contacting us at (859) 626-3400 or by email at [mark.vanleeuwen@lpl.com](mailto:mark.vanleeuwen@lpl.com).

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## Item 4 – Advisory Services

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### A. Firm Information

Van Leeuwen & Associates, Inc. (Doing Business as: Van Leeuwen Retirement & Investment Services) is an independent wealth management firm that was established as a separate legal entity in 1998 and registered with SEC as an investment advisor in August of 2017. The firm offers comprehensive financial planning and investment management.

Our office was established to provide ongoing professional advice to investors while helping them work toward their individual investment objectives. We can do this by offering truly objective financial advice on a fee basis. This method of compensation allows us to adjust your investment portfolio without requiring clients to pay commissions. Instead, clients pay an annual fee based on the assets being managed and potentially ticket charged based on the account type and position transactions.

Working on a fee basis allows us to:

- Customize an investment portfolio that is designed to help you pursue your short- and long-term investment goals.
- Provide simplified performance reporting, making it easy for you to monitor your account.
- Support you with ongoing professional advice, timely information about your account and updates on the world's financial markets.
- Manage your portfolio and make investment changes without commissions as your objectives or the economic climate changes.

More specifically, for over 20 years, Van Leeuwen Retirement and Investment Services has designed our entire business model around helping clients make critical retirement decisions. We start by focusing on the unique circumstances of a client such as their goals, lifestyle, and needs. We then evaluate the available financial options to craft a financial strategy specifically designed to address their unique circumstance with sufficient flexibility and oversight.

- Investment advisor representatives will consider the individual needs of each client when recommending an advisory platform and/or strategy.
- All material conflicts of interest are disclosed herein.
- The investment advisor representatives associated with Van Leeuwen Retirement & Investment Services are appropriately licensed, and authorized to provide advisory services on behalf of Van Leeuwen Retirement & Investment Services.

Investment advisor representatives of the firm are dually registered to offer advisory and brokerage services. In addition, investment advisor representatives are licensed insurance agents.

- Investment advisor representatives of Van Leeuwen Retirement & Investment Services are also investment advisor representatives of LPL Financial, an SEC registered investment advisor (CRD No. 6413) and separate unaffiliated legal entity.
- Investment advisor representatives of Van Leeuwen Retirement & Investment Services, are registered representatives of LPL Financial, a FINRA/SIPC member broker/dealer and separate unaffiliated legal entity, to offer brokerage services.
- Investment advisor representatives are insurance agents appointed with various insurance carriers to offer insurance products.

Investment advisor representatives of Van Leeuwen Retirement & Investment Services allocate approximately 85% to 90% of their time providing advisory services, approximately 5% to 10% providing brokerage services and approximately up to 5% providing insurance services.

## **Management Team**

**Mark D. Van Leeuwen, CFP® - Founder, President and CCO (CRD No. 1139666)** Mark has over 30 years of experience as an accredited financial advisor. Early in his career he managed a branch office for a national brokerage firm where he hired and trained advisors, managed personnel and was responsible for creating the annual budget and business plan.

For several years in the mid-90s Mark called on members of Congress to help shape legislation to benefit individual investors. The outcome of his shared efforts was the ROTH IRA.

Mark is a graduate of Rockhurst University in Kansas City, Missouri and has taught classes at Berea College (Kentucky) and Eastern Kentucky University. Mark completed the educational program for the CERTIFIED FINANCIAL PLANNER™ certification and passed the CFP® board exams to receive his CFP® certification. He also an accomplished speaker and has made presentations in local and nation venues. Mark has been featured in the trade magazines "Registered Rep" and "Financial Advisor."

### **Katie B. McDonald - Vice President of Operations (CRD No. 4410609)**

Katie McDonald serves as the Vice President of Operations. She is a graduate of Eastern Kentucky University with a formal education in Finance and Economics. Katie also brings experience in banking and marketing to her current position.

Katie holds licenses from the Commonwealth of Kentucky in life and health insurance as well as her FINRA Series 7 to serve as registered administrative associate at LPL Financial. Katie is not an investment advisor representative and does not offer asset management or financial planning services through Van Leeuwen Retirement and Investment Services.

### **Kristoffer D. Arnold, CFP® - Investment Advisor Representative (CRD No. 4395662)**

Kris joined the company in 2001. Prior to this Kris worked for three years in the banking sector and for two years in the insurance industry. Kris's role as a financial advisor is to provide the financial planning tools and investment strategies to help clients pursue and maintain their life goals.

A graduate of Eastern Kentucky University, Kris continued his education at the College for Financial Planning in Denver, Colorado, completing their educational program for the CERTIFIED FINANCIAL PLANNER™ certification. Kris has passed the CFP® board exams and has received his CFP® certification.

## **B. Advisory Services Offered**

### Investment Management Services

#### **Asset Management – Strategic Wealth Management (SWM I and SWM II)**

Strategic Wealth Management is the name of the open architecture account held through LPL as the qualified custodian to support investment advisory services provided by Van Leeuwen Retirement & Investment Services. Investment adviser representatives provide advice on the purchase and sale of various types of investments, such as mutual funds, exchange-traded funds ("ETFs"), variable annuity subaccounts, real estate investment trusts ("REITs"), equities, and fixed income securities. More specific account information and acknowledgements are further detailed in the account opening documents.

- Investment Advisors Representatives can offer SWM I or SWM II.
- The accounts offer the same investment choices and are managed in the same manner but the fee structure is different.

- For SWM I, clients are charged transaction fees in addition to the advisory fee.
- For SWM II, the transactions fees are part of the advisory fee (Wrap Fee Program).

The advisory fee for SWM II accounts may be higher than SWM I to account for the transaction fees. Depending on the anticipated level of trading and account size, investment advisor representatives of Van Leeuwen Retirement & Investment Services will work with each client to determine the most cost-effective fee structure.

There is generally a \$100,000 minimum account value required to open a SWM I or II account. However, a lower minimum account minimum may be available.

### **LPL Financial Sponsored Advisory Programs**

Van Leeuwen Retirement & Investment Services also provides advisory services through programs sponsored by LPL Financial, an SEC registered investment advisor and FINRA/SIPC member broker/dealer. Below is a brief description of the LPL advisory program available through Van Leeuwen Retirement & Investment Services. For more information regarding the LPL program, including more information on the advisory services and fees that apply, the types of investments available in the programs and the potential conflicts of interest presented by the programs please see the LPL Financial Form ADV 2A and the applicable client agreement.

#### **Optimum Market Portfolios Program (OMP)**

OMP offers clients the ability to participate in a professionally managed asset allocation program using Optimum Funds Class I shares. Under OMP, client will authorize LPL on a discretionary basis to purchase and sell Optimum Funds pursuant to investment objectives chosen by the client. Advisor will assist the client in determining the suitability of OMP for the client and assist the client in setting an appropriate investment objective. Advisor will have discretion to select a mutual fund asset allocation portfolio designed by LPL consistent with the client's investment objective. LPL will have discretion to purchase and sell Optimum Funds pursuant to the portfolio selected for the client. LPL will also have authority to rebalance the account. A minimum account value of \$10,000 is required for OMP.

#### **Personal Wealth Portfolios Program (PWP)**

PWP offers clients an asset management account using asset allocation model portfolios designed by LPL. Advisor will have discretion for selecting the asset allocation model portfolio based on client's investment objective. Advisor will also have discretion for selecting third party money managers (PWP Advisors) or mutual funds within each asset class of the model portfolio. LPL will act as the overlay portfolio manager on all PWP accounts and will be authorized to purchase and sell on a discretionary basis mutual funds and equity and fixed income securities. A minimum account value of \$250,000 is required for PWP.

#### **Model Wealth Portfolios Program (MWP)**

MWP offers clients a professionally managed mutual fund asset allocation program. Van Leeuwen Retirement & Investment Services will obtain the necessary financial data from the client, assist the client in determining the suitability of the MWP program and assist the client in setting an appropriate investment objective. The Advisor will initiate the steps necessary to open an MWP account and have discretion to select a model portfolio designed by LPL's Research Department consistent with the client's stated investment objective. LPL's Research Department is responsible for selecting the mutual funds within a model portfolio and for making changes to the mutual funds selected. The client will authorize LPL to act on a discretionary basis to purchase and sell mutual funds (including in certain circumstances exchange traded funds) and to liquidate previously purchased securities. The client will also authorize LPL to effect rebalancing for MWP accounts. In the future, the MWP program may make available model portfolios designed by strategists other than LPL's Research Department. If such models are made available, Advisor will have discretion to

choose among the available models designed by LPL and outside strategists. A minimum account value of \$25,000 is required for MWP. However, a lower account minimum may be available.

### **Manager Access Select Program**

Manager Access Select provides clients access to the investment advisory services of professional portfolio management firms for the individual management of client accounts. Advisor will assist client in identifying a third-party portfolio manager (Portfolio Manager) from a list of Portfolio Managers made available by LPL. The Portfolio Manager manages client's assets on a discretionary basis. Advisor will provide initial and ongoing assistance regarding the Portfolio Manager selection process. A minimum account value of \$100,000 is required for Manager Access Select, however, in certain instances, the minimum account size may be lower or higher.

LPL serves as program sponsor, investment advisor and broker-dealer for the LPL advisory programs. Van Leeuwen Retirement & Investment Services and LPL may share in the account fee and other fees associated with program accounts. Associated persons of Advisor are also registered representatives of LPL. Van Leeuwen Retirement & Investment Services is responsible to:

- obtain the necessary financial data from each client;
- select the proper advisory program;
- determine the investment allocation; and,
- provide tailored investment advice based on a client's investment objectives.

Accounts are reviewed on a regular basis and rebalanced as necessary according to each client's investment profile. Depending on the anticipated level of trading, positions held and account size, investment advisor representatives of Van Leeuwen Retirement & Investment Services will work with each client to determine the most cost-effective fee structure.

At no time will Van Leeuwen Retirement and Investment Services accept or maintain custody of a Client's funds or securities, except for authorized deduction of the Advisor's fees. All Client assets will be managed within their designated brokerage account or pension account, pursuant to the Client investment advisory agreement. Please see Item 12.

### Financial Planning Services

Van Leeuwen Retirement and Investment Services will typically provide a variety of financial planning and consulting services to Clients, pursuant to a written financial planning agreement. Services are offered in several areas of a Client's financial situation, depending on their goals, objectives and financial situation.

Generally, such financial planning services involve preparing a formal financial plan or rendering a specific financial consultation based on the Client's financial goals and objectives.

Van Leeuwen Retirement & Investment Services through its investment advisor representatives provides financial planning. The types of financial planning most frequently offered include:

- **Retirement** – planning an accumulation strategy with the objective of providing inflation-adjusted income for life.
- **College / Education** – planning an accumulation strategy to pay the future college / education expenses of a child or grandchild.
- **Major Purchase** – Evaluation of the pros and cons of a major purchase and its effect on other financial priorities.
- **Cash Flow/ Budget Planning** –Planning and allocating monthly cash flow in excess of current and planned future expenses in alignment with goals and priorities.
- **Debt Reduction** –Create a strategy to reduce debts and avoid future accumulated debt.



- **Windfall / Inheritance Planning** – Creating a strategy to allocate a significant increase in resources for future needs and objectives.
- **Insurance Planning** – planning for the financial needs of survivors to satisfy such financial obligations as housing, dependent child care, education and spousal arrangements
- **Estate Planning** – planning that focuses on the most efficient and tax friendly option to pass on an estate to a spouse, other family members or a charity.
- **Business Entity Planning** – review the various forms of business structures in relation to liability and income tax considerations.
- **Qualified Retirement Plans** – evaluate the types of retirement plans established by an employer for the benefit of the company's employees.
- **Stock Option Planning** – planning to maximize the value of employer issued stock options and optimize what to exercise and what to hold.
- **Key Person Planning** – evaluate the life insurance needs required in the event of the sudden loss of a key executive to buy time to find a new person or to implement other strategies to continue the business.
- **Executive Benefits** – planning to attract, reward and retain top executive talent.
- **Deferred Compensation Plans** – planning for the use of tax deferred funds to be withdrawn and taxed at some point in the future.
- **Business Succession Planning** – planning for the continuation of a business after key executives move on to new opportunities, retire or pass away with the use of buy-sell agreements, key-man insurance and engaging independent legal counsel as needed.

Financial planning can vary greatly depending on the scope and complexity of a particular individual's financial situation and may include other areas of focus as warranted.

### Conflicts of Interest

Investment advisor representatives must fully disclose all material facts concerning any conflict, and should avoid even the appearance of a conflict of interest and abide by honest and ethical business practices.

- As previously disclosed, investment advisor representatives of Van Leeuwen Retirement & Investment Services are also investment advisor representatives and registered representatives of LPL Financial to as well as insurance agents appointed with multiple insurance carriers.
  - The recommendation that a client purchase a commission product from an investment advisor representative in their separate capacity as a registered representative of LPL or as an agent of an insurance company presents a conflict of interest, as the receipt of commissions provides an incentive that may not be in a client's best interests. This conflict is mitigated by an investment advisor representative's fiduciary duty to act in a client's best interest and acting accordingly.
  - Dual registration with more than one registered investment advisor is a conflict of interest. This conflict is mitigated by an investment advisor representative's fiduciary duty to act in a client's best interest and acting accordingly.
  - Investment advisor representatives of Van Leeuwen Retirement & Investment Services receive compensation because of a client's participation in an LPL program. Depending on, among other things, the size of the account, changes in its value over time, the ability to negotiate fees or commissions, and the number of transactions, the amount of this compensation may be more



or less than what the Advisor would receive if the client participated in other programs, whether through LPL or another sponsor, or paid separately for investment advice, brokerage and other services.

- Investment advisor representatives must not induce trading in a client's account that is excessive in size or frequency in view of the financial resources and character of the account.
- Investment advisor representatives may not borrow money or securities from, or lend money or securities to a client.
- Investment advisor representatives must not place an order for the purchase or sale of a security if the security is not registered, or the security or transaction is not exempt from registration in the specific state.
- Product sponsors may pay for, or reimburse Van Leeuwen Retirement & Investment Services for the reasonable costs associated with, education or training events.
- The code of ethics permits employees and investment advisor representatives or related persons to invest for their own personal accounts in the same or different securities that an investment advisor representative may purchase for clients in program accounts.

Such conflicts and risk of misconduct are mitigated by an investment advisor representative's fiduciary duty to act in the best interests of its clients and acting accordingly. The firm's Chief Compliance Officer, Mark Van Leeuwen is available to address any questions regarding conflicts of interest.

### **Other Considerations**

Neither the firm nor any investment advisor representative are registered or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or a representative of the foregoing.

Van Leeuwen Retirement & Investment Services is not a law firm or an accounting firm and does not offer legal or accounting services. Accordingly, Van Leeuwen Retirement & Investment Services does not prepare legal documents or prepare tax returns. Van Leeuwen Retirement & Investment Services may introduce clients to other professionals for such non-investment related services. Clients are under no obligation to use these professionals and should conduct their own due-diligence prior to engaging their services. Van Leeuwen Retirement & Investment Services should not be considered a party to any disputes that may arise.

Certain mutual funds recommended by investment advisor representatives of Van Leeuwen Retirement & Investment Services are publicly available for purchase without engaging the services of Van Leeuwen Retirement & Investment Services. However, if a client elects to make such direct purchases, they do so without the benefit of the on-going advisory services offered by Van Leeuwen Retirement & Investment Services.

Van Leeuwen Retirement and Investment Services may also refer Clients to an accountant, attorney or other specialists, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of Client's financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary. Plans or consultations are typically completed within six months of contract date, assuming all information and documents requested are provided promptly.

Financial planning and consulting recommendations may pose a conflict between the interests of the Advisor and the interests of the Client. For example, a recommendation to engage the Advisor for investment management services or to increase the level of investment assets with the Advisor would pose a conflict, as it would increase the advisory fees paid to the Advisor. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the

recommendations made by the Advisor, the Client is under no obligation to effect the transaction through the Advisor.

### C. Client Account Management

Prior to engaging Van Leeuwen Retirement and Investment Services to provide investment advisory services, each Client is required to enter into an investment advisory agreement that defines the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Strategy – Van Leeuwen Retirement and Investment Services, in connection with the Client, may a strategy that seeks to achieve the Client's goals and destinations. The strategy is designed to address the Client's personal goals, investment goals, and both long-term and short-term objectives.
- Asset Allocation – Van Leeuwen Retirement and Investment Services will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance of risk for each Client.
- Portfolio Construction – Van Leeuwen Retirement and Investment Services will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – Van Leeuwen Retirement and Investment Services will provide investment management and ongoing oversight of the Client's relationship's investment portfolio.

### D. Wrap Fee Programs

SWM II is offered as a wrap fee program - a comprehensive advisory account with a single fee that covers a bundle of services; such as, portfolio management, advice, and investment research as well as trade execution, custody and reporting fees for example. The fee is not based directly upon advisory services or the execution of transactions.

Although clients do not pay a transaction charge for transactions in a SWM II account, clients should be aware that Van Leeuwen Retirement & Investment Services pays LPL transaction charges for those transactions. The transaction charges paid by Van Leeuwen Retirement & Investment Services vary based on the type of transaction (e.g., mutual fund, equity or ETF) and for mutual funds based on whether the mutual fund pays 12b-1 fees and/or recordkeeping fees to LPL.

- Clients should understand that the transaction charges to Van Leeuwen Retirement & Investment Services may be a factor that Van Leeuwen Retirement & Investment Services considers when deciding which securities to select and how frequently to place transactions in a SWM II account.
- Clients should understand this conflict and consider the additional indirect expenses borne because of the mutual fund fees when negotiating and discussing with your Advisor the advisory fee for management of an account.
- This conflict is mitigated by the fiduciary duty to act in the client's best interest and acting accordingly.

Please see the separate Wrap Fee Program disclosure brochure for more specific details.

### E. Assets Under Management

As of December 31, 2020, Van Leeuwen Retirement and Investment Services manages the following assets:

Assets Under Management	Assets
Discretionary Assets	\$260,533,719
Non-Discretionary Assets	\$0.00
<b>Total</b>	<b>\$260,533,719</b>

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

## **Item 5 – Fees and Compensation**

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The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client engaging the Advisor for services described herein shall be required to enter into a written agreement with the Advisor.

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

#### Investment Management Services

Investment advisory fees are paid quarterly, in advance, pursuant to the terms of the agreement. Investment advisory fees are based on the market value of assets under management at the end of the prior calendar quarter. Investment advisory fees are generally up to 1.75% annually based on several factors, including: the complexity of the services to be provided, the level of assets to be managed, and the overall relationship with the Advisor. Relationships with multiple objectives, specific reporting requirements, portfolio restrictions and other complexities may be charged a higher fee.

The firm's annual investment advisory fee shall be based upon a percentage (%) of the market value billed quarterly in advance based on the value on the last day of the previous quarter.

$$[\text{Quarter End Value} \times \text{Advisory Fee}] / 360 \times 90 \text{ Days} = \text{Advance Billing}$$

#### Financial Planning Services

Van Leeuwen Retirement & Investment Services through its investment advisor representatives generally provides financial planning as part of a comprehensive asset management engagement. However, financial planning may also be provided as a separate service and billed based on the number of hours required multiplied by \$100 an hour.

### **B. Fee Billing**

#### Investment Management Services

Clients will provide LPL Financial, as the qualified custodian, written authorization to directly deduct fees and pay the advisory fees to Van Leeuwen Retirement & Investment Services. The advisory fee is paid directly by LPL Financial to Van Leeuwen Retirement & Investment Services (not an individual). Van Leeuwen Retirement & Investment Services will then share the advisory fee with its advisors/associated persons. Van Leeuwen Retirement & Investment Services does not have the independent ability to increase an asset management fee.

LPL Financial will send statements on a quarterly basis to clients of Van Leeuwen Retirement & Investment Services showing the market values and all account disbursements including the amount of the advisory fees paid to Van Leeuwen Retirement & Investment Services. Additionally, LPL Financial as the qualified custodian sends clients of Van Leeuwen Retirement & Investment Services quarterly performance report that details the:

- amount of the fee charged;
- amount of assets subject to the fee; and,
- time period covered by the fee.

Clients may terminate the agreement without penalty for a full refund of fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract generally with 30 days' written notice. If the advisory agreement is terminated before the end of the quarterly period, client is entitled to a pro-rated refund of any unearned pre-paid quarterly advisory fee based on the number of days remaining in the quarter after the termination date.

The investment advisory fee in the first quarter of service is prorated from the inception date of the account[s] to the end of the first quarter. Fees may be negotiable at the discretion of the Advisor. The Client's fees will take into consideration the aggregate assets under management with Advisor. All securities held in accounts managed by Van Leeuwen Retirement and Investment Services will be independently valued by the designated Custodian. Van

Leeuwen Retirement and Investment Services will not have the authority or responsibility to value portfolio securities.

#### Financial Planning Services

Financial planning fees may be invoiced up to fifty percent (50%) of the expected total fee upon execution of the financial planning agreement. The balance shall be invoiced upon completion of the agreed upon deliverable[s].

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

Clients will incur transaction charges for trades executed in their accounts. These transaction fees are separate from our advisory fees and will be disclosed by the firm that the trades are executed through. Also, clients will pay any charges imposed directly by a mutual fund, index fund, or exchange traded fund which shall be disclosed in the fund's prospectus (i.e., fund management fees and other fund expenses).

An investment advisor representative may receive additional cash or non-cash compensation from advisory product sponsors. Such compensation may not be tied to the sales of any products. Compensation may include such items as gifts valued at less than \$100 annually, an occasional dinner or ticket to a sporting event, or reimbursement in connection with educational meetings or marketing or advertising initiatives. This additional compensation is a conflict of interest if it is tied to the sales of particular products; however, investment advisor representatives have a fiduciary duty to act in the best interests of their clients.

### **Cash Holdings**

Cash balances invested in LPL's multi-bank insured cash account (ICA) program are invested in Federal Deposit Insurance Corporation (FDIC) insured deposit accounts at one or more bank or other participating depository institutions. However, clients receive the same interest rate across all ICA deposit accounts taken in the aggregate based on a percentage of the average daily deposit balance. LPL receives a fee from the institutions participating in the ICA program based on the value of advisory assets held in the ICA program. This fee could be higher than the interest rate received by clients and/or could reduce the rate a client could receive elsewhere.

### **Ticket Charges**

Ticket charges are an administrative fee charged per trade in an account. An asset management fee may include ticket charges or a client may be responsible for such charges. When clients do not pay a transaction charge for transactions, clients should be aware that Van Leeuwen Retirement & Investment Services pays the custodian the transaction charges on their behalf. The transaction charges paid by Van Leeuwen Retirement & Investment Services vary based on the type of transaction (e.g., mutual fund, equity or ETF) and for mutual funds based on whether the mutual fund pays 12b-1 fees and/or recordkeeping fees to LPL.

- Transaction charges for equities are \$9.
- Transaction charges for and ETFs are \$0 to \$9.
- For mutual funds, the transaction charges range from \$0 to \$26.50.

When Van Leeuwen Retirement & Investment Services pays the transaction charges on behalf of a client, there is a conflict of interest based on an incentive to avoid a fee rather place a trade. This conflict is mitigated by an investment advisor's fiduciary duty to act in their client's best interest and acting accordingly.

### **Mutual Fund Share Classes**

The share class represents the amount a client will be charged for buying shares of a mutual fund, when the fee will be paid and they determine the amount of annual fees to be paid.

- Class A Shares typically pay a 12b-1 fee to LPL Financial for providing brokerage-related services to the mutual funds by charging a front or rear load.
- Class I Shares ("institutional," "investor," "retail," "service," "administrative" or "platform") share classes are no-load or load-waived share classes and therefore not subject to any upfront sales charge and do not pay 12b-1 fees

In addition, the firm is limited to the share class available through the custodian which can amount to a higher-cost share class in certain instances, the details of the different share classes are further provided in the fund prospectus.

### **LPL Financial Sponsored Programs**

LPL Financial serves as the program sponsor, investment advisor and broker/dealer for certain LPL advisory programs. Van Leeuwen Retirement & Investment Services and LPL Financial may share in the account fee and other fees associated with program accounts. Advisor receives compensation because of a client's participation in an LPL Financial program. Depending on, among other things, the size of the account, changes in its value over time, the ability to negotiate fees or commissions, and the number of transactions, the amount of this compensation may be more or less than what the Advisor would receive if the client participated in other programs, whether through LPL or another sponsor, or paid separately for investment advice, brokerage and other services.

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

#### Investment Management Services

Van Leeuwen Retirement and Investment Services is compensated for its services in advance of the quarter in which advisory services are rendered. Either party may terminate the investment advisory agreement by providing advance written notice to the other party. The Client may terminate the investment advisory agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. The Advisor will refund any unearned, prepaid investment advisory fees from the effective date of termination to the end of the quarter. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's prior approval.

#### Financial Planning Services

Van Leeuwen Retirement and Investment Services requires an advance deposit as described above. Either party may terminate the financial planning agreement by providing advance written notice to the other party. The Client may terminate the financial planning agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Client shall be billed for actual hours logged on the planning project times the contractual hourly rate or in the case of a fixed fee engage, the percentage of the engagement scope completed by the Advisor]. The Advisor will refund any unearned, prepaid planning fees from the effective date of termination. The Client's financial planning agreement with the Advisor is non-transferable without the Client's prior approval.

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

LPL Financial charges brokerage commissions and transaction fees for effecting certain securities transactions (i.e., transaction fees are charged for certain no-load mutual funds, commissions are charged for individual equity and debt securities transactions). LPL Financial enables us to obtain many no-load mutual funds without transaction charges and other no-load funds at nominal transaction charges. LPL Financial commission rates are generally discounted from customary retail commission rates. However, the commission and transaction fees charged by LPL Financial may be higher or lower than those charged by other Custodians and broker/dealers. Clients retain the right to direct their brokerage transactions at a firm other than LPL Financial. Advisory fees are generally not reduced to offset commissions or markups but clients do not pay both an advisory and brokerage fee for the same transaction.

When dealing with investment advisory clients and services, investment advisor representatives have an affirmative duty of care, loyalty, honesty and good faith to act in the best interests of its clients. Investment advisor representatives must fully disclose all material facts concerning any conflicts of interest and avoid even the appearance of a conflict of interest.

The Firm and investment advisor representatives must abide by honest and ethical business practices including, but not limited to:

- Not inducing trading in a client's account that is excessive in size or frequency in view of the financial resources and character of the account;
- Making recommendations with reasonable grounds to believe that they are appropriate based on the information furnished by the client;
- Placing discretionary orders only after obtaining client's written trading authorization contained within the advisory agreement or via separate amendment;
- Placing non-discretionary orders only after receiving express client consent per order;
- Not borrowing money or securities from, or lending money or securities to a client;
- Not placing an order for the purchase or sale of a security if the security is not registered, or the security or transaction is not exempt from registration in the specific state;

The Firm and investment advisor representatives will:

- Allocate securities in a manner that is fair and equitable to all clients
- Not effect agency-cross transactions for client accounts
- Clients retain the right to purchase investment products recommended by our firm through other, non-affiliated broker dealers or agents.

When investment advisor representatives sell an investment product on a commission basis, the firm does not charge an advisory fee in addition to the commissions paid by the client for such product. When providing services on an advisory fee basis, Van Leeuwen Retirement & Investment Services representatives do not also receive commission compensation for such advisory services. However, a client may engage the firm to provide investment management services for an advisory fee and separately purchase an investment product from an investment advisor representative in their capacity of a registered representative of LPL Financial on a commission basis. Such transactions would be outside of the asset management services.

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

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Van Leeuwen Retirement and Investment Services does not charge performance-based fees for its investment advisory services. The fees charged by Van Leeuwen Retirement and Investment Services are as described in "Item 5 – Fees and Compensation" above and are not based upon the capital appreciation of the funds or securities held by any Client.

Van Leeuwen Retirement and Investment Services does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

## **Item 7 – Types of Clients**

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Van Leeuwen Retirement & Investment Services generally provides advisory services to high net worth individuals and business owners. However, the advisory services offered by Van Leeuwen Retirement & Investment Services may be offered to additional types of clients as such opportunities may arise.

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

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

A client's portfolio may include assets of publicly held companies in the United States and foreign markets. This may include both equities and fixed income assets. Other options may include domestic and foreign debt instruments (i.e. government and corporate bonds), real estate investment trusts and mutual funds or private placements that invest in natural resources or managed futures (markets such as, and not limited to, currency, commodity, agriculture and energy).



Each market may function and change in different ways depending on supply and demand, current events and investor behaviors. While our goal is to help increase a client's net worth, there is potential for losses in market, principal, and interest values. These changes may also affect a client's tax situation and filings.

- **Fundamental Analysis** – involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages in an attempt to measure and evaluate the intrinsic value. This type of analysis concentrates on factors that determine a company's undervalued market position with a focus on the potential for 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** – involves the analysis of past market data; primarily price and volume. 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.
- **Cyclical Analysis** – involves the analysis of business cycles to find favorable conditions for buying and/or selling a security. 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 two-fold:
  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.
- **Charting Analysis** - involves the gathering and processing of price and volume information for a particular security. This price and volume information is analyzed using mathematical equations. The resulting data is then applied to graphing charts, which is used to predict future price movements based on price patterns and trends.

Analysis and strategies also consider:

- Publicly Available Data
- A Client's Net Worth
- Risk Tolerance
- Goals for Investment Account Funds
- 3<sup>rd</sup> Party Research

Each client portfolio will be initially designed to meet a particular investment goal, which we determine to be appropriate for the client's circumstances. Once the portfolio has been determined, we regularly review the portfolio and as appropriate, rebalance it based upon the client's individual needs, stated goals and objectives.

## **B. Risk of Loss**

Investing in securities involves a risk of loss that clients should be prepared to bear. There are different types of investments that involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy will be profitable or equal any specific performance level(s). Past performance is not indicative of future results. Investment advisor representatives of Van Leeuwen Retirement & Investment Services consider the following risks when managing client assets. While there may be additional risks to consider, clients, at a minimum, should understand, consider and as appropriate accept certain risks as detailed below.

- **Market Risk** – the risk that the value of securities may go up or down, sometimes rapidly or unpredictably, due to factors affecting securities markets generally or particular industries. This is a risk that will affect all securities in the same manner caused by some factor that cannot be controlled by diversification



- **Interest Rate Risk** – the risk that fixed income securities will decline in value because of an increase in interest rates; a bond or a fixed income fund with a longer duration will be more sensitive to changes in interest rates than a bond or bond fund with a shorter duration.
- **Credit Risk** – the risk that an investor could lose money if the issuer or guarantor of a fixed income security is unable or unwilling to meet its financial obligations.
- **Business Risk** – the measure of risk associated with a particular security. It is also known as unsystematic risk and refers to the risk associated with a specific issuer of a security. Generally speaking, all businesses in the same industry have similar types of business risk. More specifically, business risk refers to the possibility that the issuer of a particular company stock or a bond may go bankrupt or be unable to pay the interest or principal in the case of bonds.
- **Taxability Risk** – the risk that a security that was issued with tax-exempt status could potentially lose that status prior to maturity. Since municipal bonds carry a lower interest rate than fully taxable bonds, the bond holders would end up with a lower after-tax yield than originally planned.
- **Call Risk** – the risk specific to bond issues and refers to the possibility that a debt security will be called prior to maturity. Call risk usually goes hand in hand with reinvestment risk because the bondholder must find an investment that provides the same level of income for equal risk. Call risk is most prevalent when interest rates are falling, as companies trying to save money will usually redeem bond issues with higher coupons and replace them on the bond market with issues with lower interest rates.
- **Inflationary Risk** – the risk that future inflation will cause the purchasing power of cash flow from an investment to decline.
- **Liquidity Risk** – the possibility that an investor may not be able to buy or sell an investment as and when desired or in sufficient quantities because opportunities are limited.
- **Reinvestment Risk** – the risk that falling interest rates will lead to a decline in cash flow from an investment when its principal and interest payments are reinvested at lower rates.
- **Social/Political Risk** – the possibility of nationalization, unfavorable government action or social changes resulting in a loss of value.
- **Legislative Risk** – the risk of a legislative ruling resulting in adverse consequences.
- **Currency/Exchange Rate Risk** – the risk of a change in the price of one currency against another.
- **Pandemic Risk** – Large-scale outbreaks of infectious disease that can greatly increase morbidity and mortality over a wide geographic area, crossing international boundaries, and causing significant economic, social, and political disruption.

The firms' methods of analysis and investment strategies do not represent any significant or unusual risks however all strategies have inherent risks and performance limitations.

### **Types of Investments (Examples, not limitations)**

Investment advisor representatives of Van Leeuwen Retirement & Investment Services allocate a client's assets as appropriate to help them reach their individual investment objectives within their time horizon in a manner consistent with their risk profile. Client funds are allocated appropriately in such investments as listed below:

- **Mutual Funds** – a pool of funds collected from many investors for the purpose of investing in securities such as stocks, bonds, money market instruments and similar assets.
  - **Open-End Mutual Funds** – a type of mutual fund that does not have restrictions on the amount of shares the fund will issue and will buy back shares when investors wish to sell. Investing in mutual

funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond “fixed income” nature (lower risk) or stock “equity” nature

- **Closed-End Mutual Funds** – a type of mutual fund that raises a fixed amount of capital through an initial public offering (IPO). The fund is then structured, listed and traded like a stock on a stock exchange. Clients should be aware that closed-end funds available within the program are not readily marketable. In an effort to provide investor liquidity, the funds may offer to repurchase a certain percentage of shares at net asset value on a periodic basis. Thus, clients may be unable to liquidate all or a portion of their shares in these types of funds.
- **Alternative Strategy Mutual Funds** – Certain mutual funds available in the program invest primarily in alternative investments and/or strategies. Investing in alternative investments and/or strategies may not be suitable for all investors and involves special risks, such as risks associated with commodities, real estate, leverage, selling securities short, the use of derivatives, potential adverse market forces, regulatory changes and potential illiquidity. There are special risks associated with mutual funds that invest principally in real estate securities, such as sensitivity to changes in real estate values and interest rates and price volatility because of the fund’s concentration in the real estate industry.
- **Unit Investment Trust (UIT)** – An investment company that offers a fixed, unmanaged portfolio, generally of stocks and bonds, as redeemable “units” to investors for a specific period of time. It is designed to provide capital appreciation and/or dividend income. UITs can be resold in the secondary market. A UIT may be either a regulated investment corporation (RIC) or a grantor trust. The former is a corporation in which the investors are joint owners; the latter grants investors proportional ownership in the UIT’s underlying securities.
- **Equity** – investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environment.
- **Exchange Traded Funds (ETFs)** – an ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed “electronic shares” not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors.
- **Exchange-Traded Notes (ETNs)** – An ETN is a senior unsecured debt obligation designed to track the total return of an underlying market index or other benchmark. ETNs may be linked to a variety of assets, for example, commodity futures, foreign currency and equities. ETNs are similar to ETFs in that they are listed on an exchange and can typically be bought or sold throughout the trading day. However, an ETN is not a mutual fund and does not have a net asset value; the ETN trades at the prevailing market price. Some of the more common risks of an ETN are as follows. The repayment of the principal, interest (if any), and the payment of any returns at maturity or upon redemption are dependent upon the ETN issuer’s ability to pay. In addition, the trading price of the ETN in the secondary market may be adversely impacted if the issuer’s credit rating is downgraded. The index or asset class for performance replication in an ETN may or may not be concentrated in a specific sector, asset class or country and may therefore carry specific risks.
- **Fixed Income** – investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best-known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise,

bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

- **Hedge Funds and Managed Futures** – Hedge and managed futures funds are available for purchase in the program by clients meeting certain qualification standards. Investing in these funds involves additional risks including, but not limited to, the risk of investment loss due to the use of leveraging and other speculative investment practices and the lack of liquidity and performance volatility. In addition, these funds are not required to provide periodic pricing or valuation information to investors and may involve complex tax structures and delays in distributing important tax information. Client should be aware that these funds are not liquid as there is no secondary trading market available. At the absolute discretion of the issuer of the fund, there may be certain repurchase offers made from time to time. However, there is no guarantee that client will be able to redeem the fund during the repurchase offer.
- **Annuities** – are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirement or other long-term goals. An annuity is not a life insurance policy. Variable annuities are designed to be long-term investments, to meet retirement and other long-range goals. Variable annuities are not suitable for meeting short-term goals because substantial taxes and insurance company charges may apply if you withdraw your money early. Variable annuities also involve investment risks, just as mutual funds do.
  - **Variable Annuities** – If client purchases a variable annuity that is part of the program, client will receive a prospectus and should rely solely on the disclosure contained in the prospectus with respect to the terms and conditions of the variable annuity. Client should also be aware that certain riders purchased with a variable annuity may limit the investment options and the ability to manage the subaccounts.
- **Non-U.S. Securities** – present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.
- **Margin Accounts** – 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 value of the securities in the account goes down. The custodian, acting as the client's creditor, will have the authority to liquidate all or part of the account to repay any portion of the margin loan, even if the timing would be disadvantageous to the client. For performance illustration purposes, the margin interest charge will be treated as a withdrawal and will, therefore, not negatively impact the performance figures reflected on the quarterly advisory reports.
- **Long-Term Purchases** – Securities purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year.
- **Short-Term Purchases** – Securities purchased with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the securities' short-term price fluctuations.
- **Inverse / Enhance Market Strategies** – The purchase of mutual funds, ETFs or other exchange traded noted that are designed to perform inversely to certain market indices as an investment strategy in order to hedge against downside market risk or for the purpose of increasing gains in an advancing market.
- **Cash Positions** – Based on a perceived or anticipated market conditions and/or events, certain assets may be taken out of the market and held in a defensive cash position. All cash shall be included as assets subject to the agreed upon advisory fee. Other investment types may be included as appropriate for a particular client and their respective trading objectives.

- **Options Trading/Writing** – A securities transaction that involves buying or selling (writing) an option. If you write an option and the buyer exercises the option, you are obligated to purchase or deliver a specified number of shares at a specified price at the expiration of the option regardless of the market value of the security at expiration of the option. Buying an option gives you the right to purchase or sell a specified number of shares at a specified price until the date of expiration of the option regardless of the market value of the security at expiration of the option. Our investment strategies and advice may vary depending upon each client's specific financial situation. As such, we determine investments and allocations based upon your predefined objectives, risk tolerance, time horizon, financial horizon, financial information, liquidity needs, and other various suitability factors. Your restrictions and guidelines may affect the composition of your portfolio.
- **Options** – Certain types of option trading are permitted in order to generate income or hedge a security held in the program account; namely, the selling (writing) of covered call options or the purchasing of put options on a security held in the program account. Client should be aware that the use of options involves additional risks. The risks of covered call writing include the potential for the market to rise sharply. In such case, the security may be called away and the program account will no longer hold the security. The risk of buying long puts is limited to the loss of the premium paid for the purchase of the put if the option is not exercised or otherwise sold by the program account.
- **Structured Products** – Structured products are securities derived from another asset, such as a security or a basket of securities, an index, a commodity, a debt issuance, or a foreign currency. Structured products frequently limit the upside participation in the reference asset. Structured products are senior unsecured debt of the issuing bank and subject to the credit risk associated with that issuer. This credit risk exists whether or not the investment held in the account offers principal protection. The creditworthiness of the issuer does not affect or enhance the likely performance of the investment other than the ability of the issuer to meet its obligations. Any payments due at maturity are dependent on the issuer's ability to pay. In addition, the trading price of the security in the secondary market, if there is one, may be adversely impacted if the issuer's credit rating is downgraded. Some structured products offer full protection of the principal invested, others offer only partial or no protection. Investors may be sacrificing a higher yield to obtain the principal guarantee. In addition, the principal guarantee relates to nominal principal and does not offer inflation protection. An investor in a structured product never has a claim on the underlying investment, whether a security, zero coupon bond, or option. There may be little or no secondary market for the securities and information regarding independent market pricing for the securities may be limited. This is true even if the product has a ticker symbol or has been approved for listing on an exchange. Tax treatment of structured products may be different from other investments held in the account (e.g., income may be taxed as ordinary income even though payment is not received until maturity). Structured CDs that are insured by the FDIC are subject to applicable FDIC limits.

Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.

## Item 9 – Disciplinary Information

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There are no legal, regulatory or disciplinary events involving Van Leeuwen Retirement and Investment Services or any of its management persons. Van Leeuwen Retirement and Investment Services values the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider with whom you partner. Our backgrounds are on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching by our firm name or our CRD# 289463.

## Item 10 – Other Financial Industry Activities and Affiliations

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Investment advisor representatives are also registered representatives of LPL Financial, an unaffiliated SEC registered and FINRA/SIPC member broker/dealer. Clients may choose to engage a registered investment advisor in their capacity as a registered representative of the unaffiliated LPL Financial broker/dealer, to implement investment recommendations on a commission basis.

Representatives of our firm are also insurance agents/brokers. They offer insurance products and receive customary fees as a result of insurance sales. A conflict of interest arises as these insurance sales create an incentive to recommend products based on the compensation advisor and/or our supervised persons may earn and may not necessarily be in the best interests of the client. Investment advisor representatives have a fiduciary duty to act in the best interest of clients. Additionally, such conflicts of interest are subject to review by the Chief Compliance Officer and subject to LPL Financial surveillance controls.

An investment advisor representative is not paid both an advisory fee and a commission for the same transaction. The conflict of interest created by the different payment structures is mitigated by an investment advisor representative's fiduciary duty to act in the best interest of their client and to act accordingly.

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

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

Van Leeuwen Retirement & Investment Services maintains a Code of Ethics, which serves to establish a standard of business conduct for all employees that are based upon fundamental principles of openness, integrity, honesty and trust.

- The code of ethics includes guidelines regarding personal securities transactions of its employees and investment advisor representatives.
  - As disclosed in the Conflicts of Interests section, the code of ethics permits employees and investment advisor representatives or related persons to invest for their own personal accounts in the same or different securities that an investment advisor representative may purchase for clients in program accounts.
  - Neither Van Leeuwen Retirement & Investment Services nor a related person recommends to clients, or buys or sells for client accounts, securities in which they or a related person has a material financial interest.
- An investment advisor is considered a fiduciary.
  - As a fiduciary, it is an investment advisor's responsibility to provide fair and full disclosure of all material facts and to act solely in the best interest of each of our clients at all times.
  - A fiduciary duty is considered the core underlying principle for a Code of Ethics which also includes Insider Trading and Personal Securities Transactions Policies and Procedures.
  - All of our supervised persons must conduct business with the highest level of ethical standards and to comply with all federal and state securities laws at all times.
  - Upon employment or affiliation, all supervised persons will sign an acknowledgement that they have read, understand, and agree to comply with the Code of Ethics.

This disclosure is provided to give all clients a summary of our Code of Ethics. However, if a client or a potential client wishes to review our Code of Ethics in its entirety, a copy will be provided promptly upon request. To request a copy of our Code, please contact us at (859) 626-3400 or via email at [mark.vanleeuwen@lpl.com](mailto:mark.vanleeuwen@lpl.com).

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

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



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

Van Leeuwen Retirement and Investment Services allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities we recommend (purchase or sell) to you presents a conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted the Code to address insider trading (material non-public information controls); gifts and entertainment; outside business activities and personal securities reporting. When trading for personal accounts, Supervised Persons may have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can potentially be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by Van Leeuwen Retirement and Investment Services requiring reporting of personal securities trades by its Supervised Persons for review by the Chief Compliance Officer ("CCO"). We have also adopted written policies and procedures to detect the misuse of material, non-public information.

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

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

## Item 12 – Brokerage Practices

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### A. Recommendation of Custodian[s]

All investment advisor representatives of Van Leeuwen Retirement & Investment Services are also registered representatives of LPL and will recommend LPL Financial for securities transactions.

- Van Leeuwen Retirement & Investment Services does not maintain discretionary authority in determining the broker/dealer with whom orders for the purchase and sale of securities are placed for execution.
- Van Leeuwen Retirement & Investment Services does not have discretion regarding the commission rates at which such transactions are effected.

Each asset management client of Van Leeuwen Retirement & Investment Services will be required to establish an LPL Financial account for assets custodied at LPL Financial.

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

### 1. Soft Dollars

Van Leeuwen Retirement & Investment Services does not receive soft dollar support services from LPL Financial. Support services are however provided without cost, at a discount, and/or at a negotiated rate, and may include the following:

- investment-related research;
- pricing information and market data;
- software and other technology that provide access to client account data;
- compliance and/or practice management-related publications;
- consulting services;
- attendance at conferences, meetings, and other educational and/or social events;
- marketing support;
- computer hardware and/or software; and,
- other products and services used in furtherance of investment advisory business operations.

These support services are not considered “soft dollar” because they are provided to Van Leeuwen Retirement & Investment Services based on the overall relationship without regard to a minimum production standard or the amount of assets under management.

## **2. Best Execution**

In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although we will seek competitive rates, for the benefit of all clients, we may not necessarily obtain the lowest possible commission rates for specific client account transactions. Our recommendations to our clients are based on our clients' interests in receiving best execution and the level of competitive, professional services.

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

For advisory services, Van Leeuwen Retirement & Investment Services and its related persons may aggregate transactions in equity and fixed income securities 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 account will be deemed to have purchased or sold its proportionate share of the securities involved at the average price obtained. Van Leeuwen Retirement & Investment Services and its related persons may determine not to aggregate transactions, for example, based on the size of the trades, number of client accounts, the timing of trades, and the liquidity of the securities and the discretionary or non-discretionary nature of the trades. If Van Leeuwen Retirement & Investment Services or its related persons do not aggregate orders, some clients purchasing securities around the same time may receive a less favorable price than other clients. This means that this practice of not aggregating may cost clients more money.

## **Item 13 – Review of Accounts**

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Account surveillance is conducted on an ongoing basis by Mark Van Leeuwen, the Chief Compliance Officer. Client review periods are generally annually depending on market conditions, the client's funding needs and changes in their investment objectives. Occasionally a review may result in a "no change" recommendation. If a client has a change in their financial situation Van Leeuwen Retirement & Investment Services will perform a review to make sure that the portfolio is appropriate for the client and meets their cash needs. Clients are provided, at least quarterly, with written transaction confirmation notices and regular written summary account statements directly from the broker-dealer/custodian and/or program sponsor for accounts.

- All clients are advised that it remains their responsibility to advise Van Leeuwen Retirement & Investment Services of any changes in their investment objectives and/or financial situation.
- All clients (in person or via telephone) are encouraged to review financial planning issues (to the extent applicable), investment objectives and account performance with their investment advisor representative on an annual basis.

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

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### **A. Compensation Received by Van Leeuwen Retirement and Investment Services**

Van Leeuwen Retirement & Investment Services and employees may receive additional compensation from product sponsors. However, such compensation may not be tied to the sales of any products. Compensation may include such items as gifts valued at less than \$100 annually, an occasional dinner or ticket to a sporting event, or reimbursement in connection with educational meetings with investment advisor representative, client workshops or events, marketing events or advertising initiatives, including services for identifying prospective clients.

Product sponsors may also pay for, or reimburse Van Leeuwen Retirement & Investment Services for the costs associated with, education or training events that may be attended by Van Leeuwen Retirement & Investment Services employees and investment advisor representatives and for Van Leeuwen Retirement & Investment Services sponsored conferences and events. Such additional compensation represents a conflict of interest



however investment advisor representatives of Van Leeuwen Retirement & Investment Services have a fiduciary duty to act in the client's best interest.

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

Van Leeuwen Retirement and Investment Services does not engage paid solicitors for Client referrals.

### **Item 15 – Custody**

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Van Leeuwen Retirement & Investment Services does not have actual or constructive custody of client funds. Clients of Van Leeuwen Retirement & Investment Services directly authorize LPL Financial as a qualified custodian to deduct the firm's investment management advisory fees in advance from their account. LPL Financial serves as the qualified custodian for assets managed by Van Leeuwen Retirement & Investment Services.

- The custodian sends statements at least quarterly to clients showing all disbursements in account including the amount of the advisory fees paid to advisor, the value of client assets upon which advisor's fee was based, and the specific manner in which advisor's fee was calculated.
- Payment of fees may result in the liquidation of a client's positions if there are insufficient funds in the account.
- Fees are assessed on all assets in the account(s), including securities, cash or money market balances.
- Margin debits do not reduce the value of the assets in the account for billing purposes.

Clients should review the fee calculated and deducted by the custodian to ensure that the fees were calculated correctly.

### **Item 16 – Investment Discretion**

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Van Leeuwen Retirement & Investment Services provides investment advisory services on a discretionary basis. Prior to assuming discretionary authority over a client's account, the client shall be required to execute an Investment Advisory Agreement, naming Van Leeuwen Retirement & Investment Services as the client's limited power of attorney, granting the Van Leeuwen Retirement & Investment Services full authority to buy, sell, or otherwise effect investment transactions involving the assets in the client's name found in the discretionary account.

### **Item 17 – Voting Client Securities**

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Van Leeuwen Retirement & Investment Services does not vote client proxies. Clients will otherwise receive their proxies or other solicitations directly from their custodian. Clients may contact Van Leeuwen Retirement & Investment Services at (859) 626-3400 to discuss any questions they may have with a particular proxy vote. To request further assistance on a proxy voting issue please contact the offering company.

However, third party money managers selected or recommended by our firm may vote proxies for clients. Therefore, except in the event a third-party money manager votes proxies, clients maintain exclusive responsibility for:

- (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted; and,
- (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets.

Therefore (except for proxies that may be voted by a third-party money manager), our firm and/or you shall instruct your qualified custodian to forward to you copies of all proxies and shareholder communications relating to your investment assets.

## **Item 18 – Financial Information**

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Van Leeuwen Retirement & Investment Services does not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance. There are no financial conditions that are reasonably likely to impair the firm's ability to meet contractual commitments to clients. At no time has Van Leeuwen Retirement & Investment Services been the subject of a bankruptcy petition.



## **Van Leeuwen Retirement and Investment Services Retirement and Investment Services**

### **Form ADV Part 2A – Appendix 1 ("Wrap Fee Brochure")**

**Effective:** January 14, 2021

This Form ADV2A - Appendix 1 ("Wrap Fee Brochure") provides information about the qualifications and business practices for Van Leeuwen Retirement and Investment Services Retirement and Investment Services ("Van Leeuwen Retirement and Investment Services" or the "Advisor") services when offering services pursuant to a wrap program. This Wrap Fee Brochure shall always be accompanied by the Van Leeuwen Retirement and Investment Services Disclosure Brochure, which provides complete details on the business practices of the Advisor. If you did not receive the complete Van Leeuwen Retirement and Investment Services Disclosure Brochure or you have any questions about the contents of this Wrap Fee Brochure or the Van Leeuwen Retirement and Investment Services Disclosure Brochure, please contact us at (859) 626-3400 or by email at [mark.vanleeuwen@lpl.com](mailto:mark.vanleeuwen@lpl.com).

Van Leeuwen Retirement and Investment Services is a registered investment advisor with the U.S. Securities and Exchange Commission ("SEC") / located in Kentucky. The information in this Wrap Fee Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Wrap Fee Brochure provides information about Van Leeuwen Retirement and Investment Services to assist you in determining whether to retain the Advisor.

Additional information about Van Leeuwen Retirement and Investment Services and its advisory persons are available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching for our firm name or by our CRD# 289463.

## Item 2 – Material Changes

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Form ADV 2 - Appendix 1 provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. In particular, this Wrap Fee Brochure discusses wrap fee programs offering by the Advisor.

### Material Changes

There have been no material changes to the content of this Wrap Fee Program Brochure.

### Future Changes

From time to time, we may amend this Wrap Fee Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Wrap Fee Brochure (along with the complete Van Leeuwen Retirement and Investment Services Disclosure Brochure) or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of Van Leeuwen Retirement and Investment Services.

At any time, you may view this Wrap Fee Brochure and the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching for our firm name or by our CRD# 289463. You may also request a copy of this Disclosure Brochure at any time, by contacting us at (859) 626-3400 or by email at [mark.vanleeuwen@jpl.com](mailto:mark.vanleeuwen@jpl.com).

### **Item 3 – Table of Contents**

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## **Item 4 – Services Fees and Compensation**

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### **A. Services**

Van Leeuwen Retirement & Investment Services through its investment advisor representatives provides ongoing investment advice and management on assets in the client's advisory account held by an approved custodian to support investment advisory services provided by Van Leeuwen Retirement & Investment Services to our clients. More specific account information and acknowledgements are further detailed on the account application.

Investment advisor representatives provide advice on the purchase and sale of various types of investments, such as mutual funds, unit investment trusts ("UITs"), exchange-traded funds ("ETFs"), exchange-traded notes ("ETNs"), leveraged and inverse ETFs, ETNs and mutual funds, options, structured products, hedge funds and managed futures, annuities, real estate investment trusts ("REITs"), equities, and fixed income securities. The advice is tailored to the individual needs of the client based on the investment objective chosen by the client in order to help assist clients in attempting to meet their financial goals. Accounts are reviewed on a regular basis and rebalanced as necessary according to each client's investment profile.

An investment advisor representative recommending the wrap fee program receives compensation as a result of a client's participation in the program. The amount of this compensation may be more than what the person would receive if the client participated in other programs or paid separately for investment advice, brokerage, and other services. Therefore, investment advisor representatives may have a financial incentive to recommend the wrap fee program over other programs or services.

There may be additional fees on assets held in the wrap program, such as mutual fund expenses and mark-ups, mark-downs, or spreads paid to market makers. A more detailed description of these fees and circumstances is detailed above in Item 4 above.

Neither the firm or any supervised persons accepts performance-based fees, fees based on a share of capital gains on or capital appreciation of the assets of a client such as a hedge fund or other pooled investment vehicle. Neither the firm or any supervised persons manages side-by-side accounts that are charged a performance-based fee and accounts that are charged another type of fee, such as an hourly or flat fee or an asset-based fee. Investment advisor representatives are restricted to providing services and charging fees based in accordance with the descriptions detailed in this document and the account agreement. However, the exact service and fees charged to a particular client are dependent upon the representative that is working with the client. Investment advisor representatives are instructed to consider the individual needs of each client when recommending an advisory platform. Investment strategies and recommendations are tailored to the individual needs of each client. For more information about the investment advisor representative managing the account, client should refer to the Brochure Supplement for the associated person, which client should have received along with this Brochure at the time client opened the account.

LPL Financial, as the qualified custodian, performs certain administrative services for Van Leeuwen Retirement & Investment Services, including generation of quarterly performance reports for program accounts. Client will receive an individual quarterly performance report, which provides performance information on a time weighted basis. The performance reports are intended to inform clients as to how their investments have performed for a period, both on an absolute basis and compared to leading investment indices.

Please see Item 4 – Advisory Services of the Disclosure Brochure for details on Van Leeuwen Retirement and Investment Services's investment philosophy and related services.

### **B. Program Costs**

Advisory services provided by Van Leeuwen Retirement and Investment Services are offered in a wrap fee structure whereby normal securities transaction costs are included in the overall investment advisory fee paid to Van Leeuwen Retirement and Investment Services. As the level of trading in a Client's account[s] may vary from year to year, the annual cost to the Client may be more or less than engaging for advisory services where the transactions costs are borne separately by the Client. The cost of the Wrap Fee Program varies depending on services to be provided to each Client, however, the Client is not charged more if there is higher trading activity in the Client's account[s]. A Wrap Fee structure has a potential conflict of interest as the Advisor may have an

incentive to limit the number of trades placed in the Client's account[s]. Please see Item 5 – Fees and Compensation of the Disclosure Brochure for complete details on fees.

### **C. Fees**

In the Van Leeuwen Retirement & Investment Services Wrap program, clients pay Van Leeuwen Retirement & Investment Services a single annual advisory fee for advisory services and execution of transactions. Clients do not pay brokerage commissions, markups or transaction charges for execution of transactions in addition to the advisory fee. The advisory fee is customarily 1%-1.75% but may be negotiated between the client and Van Leeuwen Retirement & Investment Services for accounts of larger sizes. Standard fees are set out in the advisory agreement.

The advisory fee is a percentage based on the value of all assets in the account, including cash holdings. The maximum advisory fee will not exceed 1.75%.

- The advisory fee is paid to Van Leeuwen Retirement & Investment Services and is shared between Van Leeuwen Retirement & Investment Services and its associated persons.
- The advisory fee may be higher than the fee charged by other investment advisors for similar services.
- Van Leeuwen Retirement & Investment Services does not accept performance-based fees for program accounts.

The advisory fees will be calculated and deducted on a quarterly basis in advance. If the advisory agreement is terminated before the end of the quarterly period, the client is entitled to a pro-rated refund of any pre-paid quarterly advisory fee based on the number of days remaining in the quarter after the termination date, which will be processed by the custodian.

Although clients do not pay a transaction charge for transactions in a program account, clients should be aware that Van Leeuwen Retirement & Investment Services pays the custodian transaction charges for the transactions. The transaction charges paid by Van Leeuwen Retirement & Investment Services vary based on the type of transaction (e.g., mutual fund, equity or fixed income security) and range from \$0 to \$50. Because Van Leeuwen Retirement & Investment Services pays the transaction charges in program accounts, there is a conflict of interest. Clients should understand that the cost to Van Leeuwen Retirement & Investment Services of transaction charges may be a factor that Van Leeuwen Retirement & Investment Services considers when deciding which securities to select and how frequently to place transactions in a program account.

### **Other Types of Fees and Charges**

Program accounts will incur additional fees and charges from parties other than Van Leeuwen Retirement & Investment Services as noted below. These fees and charges are in addition to the advisory fee paid to Van Leeuwen Retirement & Investment Services. Van Leeuwen Retirement & Investment Services does not share in any portion of these third-party fees.

The custodian and executing broker-dealer will impose certain fees and charges. Clients are notified of these charges at account opening. The custodian will deduct these fees and charges directly from the client's program account.

There are other fees and charges that are imposed by other third parties that apply to investments in program accounts. Some of these fees and charges are described below.

- If a client's assets are invested in mutual funds or other pooled investment products, clients should be aware that there will be two layers of advisory fees and expenses for those assets. Clients pay an advisory fee to the fund manager and other expenses as a shareholder of the fund. Clients will also pay Van Leeuwen Retirement & Investment Services the advisory fee with respect to those assets. Most of the mutual funds available in the program may be purchased directly. Therefore, clients could generally avoid the second layer of fees by not using the management services of Van Leeuwen Retirement &



Investment Services and by making their own investment decisions.

- Certain mutual funds impose fees and charges such as contingent deferred sales charges, early redemption fees and charges for frequent trading. These charges may apply if client transfers into or purchases such a fund with the applicable charges in a program account.
- Although only no-load and load-waived mutual funds can be purchased in a program account, clients should understand that some mutual funds pay asset based sales charges or service fees (e.g., 12b-1 fees) to the custodian with respect to account holdings.
- If a client holds a variable annuity as part of an account, there are mortality, expense and administrative charges, fees for additional riders on the contract and charges for excessive transfers within a calendar year imposed by the variable annuity sponsor.

Further information regarding fees assessed by a mutual fund, or variable annuity is available in the appropriate prospectus, which is available upon request from Van Leeuwen Retirement & Investment Services or from the product sponsor directly.

### **Other Important Considerations**

- The advisory fee is an ongoing wrap fee for investment advisory services, the execution of transactions and other administrative and custodial services. The advisory fee may cost the client more than purchasing the program services separately, for example, paying an advisory fee plus commissions for each transaction in the account. Factors that bear upon the cost of the account in relation to the cost of the same services purchased separately include the type and size of the account, historical and or expected size or number of trades for the account, and number and range of supplementary advisory and client-related services provided to the client.
- The advisory fee also may cost the client more than if 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.
- Van Leeuwen Retirement & Investment Services receives compensation when a client participates in the program. This compensation includes the advisory fee and other compensation, such as financial assistance or the sponsorship of conferences and educational sessions, marketing support, incentive awards, payment of travel expenses, and tools to assist with providing various services to clients. The amount of this compensation may be more or less than what Van Leeuwen Retirement & Investment Services would receive if the client participated in other LPL programs, programs of other investment advisors or paid separately for investment advice, brokerage and other client services. Therefore, Van Leeuwen Retirement & Investment Services may have a financial incentive to recommend a program account over other programs and services.
- The investment products available to be purchased in the program can be purchased by clients outside of a program account, through broker-dealers or other investment firms not affiliated with Van Leeuwen Retirement & Investment Services.
- Investment advisor representatives are also licensed insurance agents. In the capacity of an insurance agent, they may recommend the purchase of certain insurance-related products on a commission basis in addition to advisory fees.
- The purchase of securities and/or insurance products that pay a commission represent a conflict of interest, as the receipt of commissions provides an incentive to recommend investment products based on commissions received, rather than on a particular client's need. No client is under any obligation to purchase any commission products from Investment advisor representatives of the firm. Clients may

purchase investment products recommended by investment advisor representatives through other, non-affiliated broker/dealers or insurance agents. Such conflicts are subject to review by the Chief Compliance Officer for consistency with the firm's Code of Ethics.

#### **D. Compensation**

Van Leeuwen Retirement and Investment Services is the sponsor and portfolio manager of this Wrap Fee Program. Van Leeuwen Retirement and Investment Services receives investment advisory fees paid by Clients for participating in the Wrap Fee Program and pays the Custodian for the costs associated with the normal trading activity in the Client's account[s].

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

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There is generally a \$100,000 minimum required to participate in the wrap fee program.

Van Leeuwen Retirement & Investment Services generally provides advice for individuals and worth individuals as well as small businesses. However, the advisory services offered by Van Leeuwen Retirement & Investment Services are also available to banks and thrift institutions, estates, charitable organizations as well as state and municipal government entities, corporations and pension plans as such opportunities may arise.

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

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#### **Portfolio Manager Selection**

In the Van Leeuwen Retirement & Investment Services Wrap program, Van Leeuwen Retirement & Investment Services is responsible for the investment advice and management offered to clients.

Investment advisor representatives of Van Leeuwen Retirement & Investment Services serve as the portfolio manager and are generally required to have several years of experience dealing with individuals and small business as well as a college degree and/or industry professional designation. Since investment advisor representatives directly serve as the portfolio manager there is not a selection process for replacing or recommending outside portfolio managers.

Account performance reports are provided by Van Leeuwen Retirement & Investment Services or the custodian on a quarterly basis.

There are no differences between how the wrap fee program is managed and how other accounts are managed. However, Van Leeuwen Retirement & Investment Services may charge a higher fee, up to 1.75%, and receive a portion of the wrap fee for services provided. The combined total fee will not exceed 1.75%. The program may cost more or less than purchasing such services separately.

#### **Performance-Based Fees**

Van Leeuwen Retirement and Investment Services does not charge performance-based fees.

#### **Supervised Persons**

Van Leeuwen Retirement and Investment Services Advisory Persons serve as portfolio managers for all accounts, including the services described in this Wrap Fee Brochure. Details of the advisory services provided are included in Item 4.A. of the Disclosure Brochure.

#### **Methods of Analysis**

Please see Item 8 of the Disclosure Brochure (included with this Wrap Fee Brochure) for details on the research and analysis methods employed by the Advisor.

#### **Risk of Loss**

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. Van Leeuwen Retirement and Investment Services will

assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

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

Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor. Please see Item 8.B. – Risk of Loss in the Disclosure Brochure for details on investment risks.

### **Proxy Voting**

Van Leeuwen Retirement & Investment Services does not vote client proxies. Clients will otherwise receive their proxies or other solicitations directly from their custodian. Clients may contact Van Leeuwen Retirement & Investment Services at (859) 626-3400 to discuss any questions they may have with a particular proxy vote. To request assistance on a proxy voting issue please contact the offering company.

However, third party money managers selected or recommended by our firm may vote proxies for clients. Therefore, except in the event a third-party money manager votes proxies, clients maintain exclusive responsibility for:

- directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted; and,
- making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets.

Therefore (except for proxies that may be voted by a third-party money manager), our firm and/or you shall instruct your qualified custodian to forward to you copies of all proxies and shareholder communications relating to your investment assets.

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

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Van Leeuwen Retirement and Investment Services is the sponsor and sole portfolio manager for the Program. The Advisor does not share Client information with other portfolio managers because it is the sole portfolio manager for this Wrap Fee Program. Please also see the Van Leeuwen Retirement and Investment Services Privacy Policy (included after this Wrap Fee Program Brochure).

## **Item 8 – Client Contact with Portfolio Managers**

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Van Leeuwen Retirement and Investment Services is a full-service investment management advisory firm. Clients always have direct access to the Portfolio Managers at Van Leeuwen Retirement and Investment Services.

## **Item 9 – Additional Information**

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### **Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of an advisory firm or the integrity of a firm's management.

Any such disciplinary information for the company and the company's investment advisor representatives would be provided herein and publicly accessible by selecting the Investment Advisor Search option at <http://www.adviserinfo.sec.gov>. There are no legal or disciplinary events to disclose.

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

Investment advisor representatives may also be registered representatives of LPL Financial, an unaffiliated SEC registered and FINRA/SIPC member broker/dealer. Clients may choose to engage an investment advisor representative in their capacity as a registered representative of the unaffiliated LPL Financial broker/dealer, to implement investment recommendations on a commission basis. Investment advisor representatives of Van Leeuwen Retirement & Investment Services may receive compensation for the sale of securities or other investment products in their capacity as a registered representative of LPL Financial.

Representatives of our firm may also be insurance agents/brokers. They may offer insurance products and receive customary fees as a result of insurance sales. Insurance products will only be offered in states where the representative offering insurance is properly licensed.

A conflict of interest may arise as these insurance sales may create an incentive to recommend products based on the compensation Van Leeuwen Retirement & Investment Services and/or our supervised persons may earn and may not necessarily be in the best interests of the client. Such potential conflicts of interest are subject to review by the Chief Compliance Officer.

- Neither Van Leeuwen Retirement & Investment Services nor any of the management persons are registered or has a registration pending to register as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.
- Van Leeuwen Retirement & Investment Services will ensure third party investment advisers are properly registered, licensed, and/or notice-filed with the appropriate state(s).
- Van Leeuwen Retirement & Investment Services may or may not have discretion over client funds as indicated in the advisory agreement.
- Van Leeuwen Retirement & Investment Services does not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance or otherwise have actual or constructive custody of client funds.
- There are no financial conditions that are reasonably likely to impair the firm's ability to meet contractual commitments to clients. At no time Van Leeuwen Retirement & Investment Services been the subject of a bankruptcy petition.

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

Van Leeuwen Retirement & Investment Services maintains a Code of Ethics, which serves to establish a standard of business conduct for all employees that are based upon fundamental principles of openness, integrity, honesty and trust.

- The code of ethics includes guidelines regarding personal securities transactions of its employees and investment advisor representatives.
  - As disclosed in the Conflicts of Interests section, the code of ethics permits employees and investment advisor representatives or related persons to invest for their own personal accounts in the same or different securities that an investment advisor representative may purchase for clients in program accounts.
  - Neither Van Leeuwen Retirement & Investment Services nor a related person recommends to clients, or buys or sells for client accounts, securities in which they or a related person has a material financial interest.
- An investment adviser is considered a fiduciary.

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**Van Leeuwen Retirement and Investment Services**  
808 West Main Street, Richmond, KY 40475  
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[www.vlretirement.com](http://www.vlretirement.com)

- As a fiduciary, it is an investment adviser's responsibility to provide fair and full disclosure of all material facts and to act solely in the best interest of each of our clients at all times.
- A fiduciary duty is considered the core underlying principle for a Code of Ethics which also includes Insider Trading and Personal Securities Transactions Policies and Procedures.
- All of our supervised persons must conduct business with the highest level of ethical standards and to comply with all federal and state securities laws at all times.
- Upon employment or affiliation, all supervised persons will sign an acknowledgement that they have read, understand, and agree to comply with the Code of Ethics.

This disclosure is provided to give all clients a summary of our Code of Ethics. However, if a client or a potential client wishes to review our Code of Ethics in its entirety, a copy will be provided promptly upon request.

### **Review of Accounts**

Investment advisor representatives conduct reviews of client advisory accounts on a periodic basis (at least annually) for consistency with the client's stated investment objectives, among other factors. All investment advisory clients are advised that it remains their responsibility to advise Van Leeuwen Retirement & Investment Services of any changes in their investment objectives and/or financial situation. Investment adviser representatives, may also conduct account reviews based on the occurrence of a triggering event, such as a change in client investment objectives and/or financial situation, market corrections and by client request. All clients (in person or via telephone) are encouraged to review financial planning issues (the extent applicable), investment objectives and account performance with their investment adviser representative on an annual basis. During a month where there is activity in the program account, clients will receive a monthly account statement from LPL Financial showing account activity as well as positions held in the account at month end. Additionally, clients will receive a confirmation of each transaction that occurs within the program account unless the transaction is the result of a systematic purchase, redemption or exchange. Clients will also receive a detailed quarterly report showing performance, positions and activity from LPL Financial.

For advisory accounts held at custodians and third-party advisors other than LPL Financial, accounts will be reviewed based on similar criteria.

### **Other Compensation**

Van Leeuwen Retirement & Investment Services and its associated persons may receive additional non-cash compensation from product sponsors. However, such compensation may not be tied to the sales of any products. Compensation may include such items as gifts valued at less than \$100 annually, an occasional dinner or ticket to a sporting event, or reimbursement in connection with educational meetings or marketing or advertising initiatives. Product sponsors may also pay for education or training events that may be attended by Van Leeuwen Retirement & Investment Services employees and associated persons. There are no other economic benefits provided by someone who is not a client for providing investment advice. However, financial assistance or the sponsorship of conferences and educational sessions, marketing support, incentive awards, payment of travel expenses, and tools to assist investment adviser representative in providing various services to clients may be provided by LPL Financial.

### **Financial Information Custody**

Van Leeuwen Retirement & Investment Services does not have actual or constructive custody of client funds. Clients of Van Leeuwen Retirement & Investment Services directly authorize a qualified custodian to deduct the firm's investment management advisory fees in advance from their account.

- The custodian sends statements at least quarterly to clients showing all disbursements in account including the amount of the advisory fees paid to advisor, the value of client assets upon which advisor's fee was based, and the specific manner in which advisor's fee was calculated.
- Payment of fees may result in the liquidation of a client's positions if there are insufficient funds in the account.
- Fees are assessed on all assets in the account(s), including securities, cash or money market balances.

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**Van Leeuwen Retirement and Investment Services**  
 808 West Main Street, Richmond, KY 40475  
 Phone: (859) 626-3400 | Fax: (859) 626-3467  
[www.vlretirement.com](http://www.vlretirement.com)

- Margin debits do not reduce the value of the assets in the account for billing purposes.

Clients should review the fee calculated and deducted by the custodian to ensure that the fees were calculated correctly.

### **Brokerage Practices**

All investment adviser representatives of Van Leeuwen Retirement & Investment Services are also registered representatives of LPL and will recommend LPL Financial for securities transactions.

- Van Leeuwen Retirement & Investment Services does not maintain discretionary authority in determining the broker/dealer with whom orders for the purchase and sale of securities are placed for execution.
- Van Leeuwen Retirement & Investment Services does not have discretion regarding the commission rates at which such transactions are effected.

Each asset management client of Van Leeuwen Retirement & Investment Services will be required to establish an LPL Financial account.

### **Soft Dollars**

Van Leeuwen Retirement & Investment Services does not receive soft dollar support services from LPL Financial. Support services are provided without cost, at a discount, and/or at a negotiated rate, and may include the following:

- investment-related research;
- pricing information and market data;
- software and other technology that provide access to client account data;
- compliance and/or practice management-related publications;
- consulting services;
- attendance at conferences, meetings, and other educational and/or social events;
- marketing support;
- computer hardware and/or software; and,
- other products and services used in furtherance of investment advisory business operations.

These support services are not considered “soft dollar” because they are provided to Van Leeuwen Retirement & Investment Services based on the overall relationship without regard to a minimum production standard or the amount of assets under management.

### **Best Execution**

In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer’s services, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although we will seek competitive rates, for the benefit of all clients, we may not necessarily obtain the lowest possible commission rates for specific client account transactions. Our recommendations to our clients are based on our clients’ interests in receiving best execution and the level of competitive, professional services.

### **Trade Aggregation**

For advisory services, Van Leeuwen Retirement & Investment Services and its related persons may aggregate transactions in equity and fixed income securities 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 account will be deemed to have purchased or sold its proportionate share of the

securities involved at the average price obtained. Van Leeuwen Retirement & Investment Services and its related persons may determine not to aggregate transactions, for example, based on the size of the trades, number of client accounts, the timing of trades, and the liquidity of the securities and the discretionary or non-discretionary nature of the trades. If Van Leeuwen Retirement & Investment Services or its related persons do not aggregate orders, some clients purchasing securities around the same time may receive a less favorable price than other clients. This means that this practice of not aggregating may cost clients more money.



Registered as: Van Leeuwen & Associates, Inc. | CRD No. 289463



Doing Business As: Van Leeuwen Retirement & Investment Services

**Mark D. Van Leeuwen CFP<sup>®</sup>**

CRD No. 1139666

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<http://www.vlretirement.com>

**January 14, 2021**

This brochure supplement provides information about Mark Van Leeuwen that supplements the Van Leeuwen Retirement & Investment Services disclosure brochure. You should have received a copy of that brochure that describes the investment advisory services offered through Van Leeuwen Retirement & Investment Services, an investment advisor firm. Please contact Van Leeuwen Retirement & Investment Services at the telephone number above if you did not receive their brochure or if you have any questions about the contents of this supplement. Additional information about Mark Van Leeuwen is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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**Van Leeuwen Retirement and Investment Services**  
808 West Main Street, Richmond, KY 40475  
Phone: (859) 626-3400 | Fax: (859) 626-3467  
[www.vlretirement.com](http://www.vlretirement.com)

## Item 2 - Educational Background and Business Experience

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This section of the brochure supplement includes the supervised person's name, age (or year of birth), formal education after high school, and business background (including an identification of the specific positions held) for the preceding five years.

Mark D. Van Leeuwen

Year of birth: 1959

### Education

The following information details your Investment advisor representative's formal education. If a degree was attained, the type of the degree will be listed next to the name of the institution. If a degree is not listed, the Investment advisor representative attended the institution but did not attain a degree.

Rockhurst University; BSBA Finance  
08/15/1978 – 05/15/1982

### Business Experience

The following information details your Investment advisor representative's business experience for at least the past 5 years.

Van Leeuwen Retirement & Investment Services – Investment Advisor Representative  
07/2017 – Present

LPL Financial, LLC – Registered Representative  
09/1998 – Present

LPL Financial, LLC – Investment Advisor Representative  
09/1998 – Present

### Professional Designations

#### **Certified Financial Planner™ - CFP® 03/2000**

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 Services, income tax planning, retirement planning, and estate planning;

**Examination** – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's

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ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;

**Experience** – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and

**Ethics** – Agree to be bound by CFP Board's Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals. Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

**Continuing Education** – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and,

**Ethics** – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients. CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

#### **Chartered Life Underwriter® - CLU®**

Designation: Chartered Life Underwriter (CLU). Issuing Organization: The American College.

Prerequisites/Experience Required: 3 years of full-time business experience within the five years preceding the awarding of the designation. Educational Requirements: 5 core and 3 elective courses. Continuing Education: 30 hours every 2 years.

### **Item 3 - Disciplinary Information**

This section includes any legal or disciplinary events and material to a client's or prospective client's evaluation of the supervised person.

There are no legal or disciplinary event(s) to disclose.

### **Item 4 - Other Business Activities**

This section includes any relationship between the advisory business and the supervised person's other financial industry activities that creates a material conflict of interest with clients and describes the nature of the conflict and generally how it is addressed. If the supervised person is actively engaged in any investment-related business or occupation, including if the supervised person is registered, or has an application pending to register, as a broker-dealer, registered representative of a broker-dealer, futures commission merchant ("FCM"), commodity pool operator ("CPO"), commodity trading advisor ("CTA"), or an associated person of an FCM, CPO, or CTA, the business relationship, if any, between the advisory business and the other business is disclosed below.

#### **Insurance Licensed Registered Representative:**

Mark Van Leeuwen is also a broker or registered representative of LPL Financial and receives commissions and other types of compensation for the sale of securities. Mark Van Leeuwen also sells insurance and receives commissions for insurance product sales. The potential for the receipt of commissions provides an incentive to recommend investment or insurance products based on the compensation received, rather than on the client's needs. However, Mark Van Leeuwen has a fiduciary duty to only recommend securities and/or insurance products that are in your best interests. If you have any questions regarding the compensation Mark Van Leeuwen receives when recommending a product, you should ask. You are under no obligation to purchase investment products or insurance through Mark Van Leeuwen.

## **Item 5 - Additional Compensation**

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This section includes details regarding if someone who is not a client provides an economic benefit to the supervised person for providing advisory services. For purposes of this Item, economic benefits include sales awards and other prizes, but not the supervised person's regular salary, if any.

Mark Van Leeuwen receives economic benefits from persons other than clients in connection with advisory services. Mark Van Leeuwen provides services in an Asset Management account and may recommend mutual funds. Only no-load and load-waived mutual funds are available to be purchased in such asset management accounts. However, some of these mutual funds pay distribution or service fees (e.g., 12b-1 fees) payable to LPL Financial. However, when Mark Van Leeuwen provides investment advisory services, it is as a fiduciary under the Investment Advisers Act and has a duty to act in your best interest and to make full and fair disclosure to you of all material facts and conflicts of interest. Mark Van Leeuwen may receive compensation from product sponsors. Compensation includes such items as gifts valued at less than \$100 annually, an occasional dinner or ticket to a sporting event, or reimbursement in connection with educational or training events or marketing or advertising initiatives. Such compensation may not be tied to the sale of any products. Mark Van Leeuwen receives compensation as a result of your participation in LPL Investment advisor representative programs. LPL Financial shares a portion of the account fee you pay with your advisor, which may be more than what would have been received at another investment advisor firm. This compensation also includes other types of compensation, such as bonuses, awards or other things of value offered by LPL Financial. LPL Financial pays your advisor in different ways, such as payments based on production, awards of stock options to purchase shares of LPL Financial's parent company, LPL Financial Holdings Inc., reimbursement of fees that he may pay to LPL Financial for items such as administrative services, and other things of value such as free or reduced-cost marketing materials, payments in connection with the transition of association from another broker/dealer or investment advisor firm to LPL Financial, advances of advisory fees, or attendance at LPL Financial's national conference or top producer forums and events. LPL Financial may pay your advisor this compensation based on his overall business production and/or on the amount of assets serviced in LPL Investment advisor representative programs. Therefore, the amount of this compensation may be more than what would be received if a client participated in other LPL Financial programs, programs of other investment advisor firms or paid separately for investment advice, brokerage and other client services. Therefore, your advisor has a financial incentive to recommend an advisory program over other programs and services. However, your advisor has a fiduciary duty to only recommend a program or service that is in your best interest.

## **Item 6 – Supervision**

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This section explains how Van Leeuwen Retirement & Investment Services supervises the supervised person, including how the advice the supervised person provided to clients is monitored.

Van Leeuwen Retirement & Investment Services maintain a supervisory structure and system reasonably designed to prevent violations of the Investment Advisers Act of 1940. Your Advisors securities-related activities are supervised by an individual registered as a principal in accordance with FINRA regulations. In addition, compliance staff uses tools that monitor the advisory services provided by Mark Van Leeuwen, for example, with respect to asset allocation, concentration, and account activity. The Chief Compliance Officer, responsible for administering the Van Leeuwen Retirement & Investment Services policies and procedures for investment advisory activities and for regularly evaluating their effectiveness. The Chief Compliance Officer can be reached at (859) 626-3400.

Registered as: Van Leeuwen & Associates, Inc. | CRD No. 289463



Doing Business As: Van Leeuwen Retirement & Investment Services

**Kristoffer D. Arnold, CFP<sup>®</sup>**

CRD No. 4395662

808 West Main Street | Richmond, KY 40475  
(859) 626-3400 – Phone | (859) 626-3467 - Fax

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Kristoffer D. Arnold  
Year of birth: 1978

### Education

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Eastern Kentucky University; Bachelors  
08/01/1996 – 12/01/2000

### Business Experience

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Van Leeuwen Retirement & Investment Services – Investment Advisor Representative  
07/2017 – Present

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05/2001 – Present

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mutual funds. Only no-load and load-waived mutual funds are available to be purchased in such asset management accounts. However, some of these mutual funds pay distribution or service fees (e.g., 12b-1 fees) payable to LPL Financial. However, when Kristoffer Arnold provides investment advisory services, it is as a fiduciary under the Investment Advisers Act and has a duty to act in your best interest and to make full and fair disclosure to you of all material facts and conflicts of interest. Kristoffer Arnold receives compensation from product sponsors. Compensation includes such items as gifts valued at less than \$100 annually, an occasional dinner or ticket to a sporting event, or reimbursement in connection with educational or training events or marketing or advertising initiatives. Such compensation may not be tied to the sale of any products. Kristoffer Arnold receives compensation as a result of your participation in LPL Investment advisor representative programs. LPL Financial shares a portion of the account fee you pay with your advisor, which may be more than what would have been received at another investment advisor firm. This compensation also includes other types of compensation, such as bonuses, awards or other things of value offered by LPL Financial. LPL Financial pays your advisor in different ways, such as payments based on production, awards of stock options to purchase shares of LPL Financial's parent company, LPL Financial Holdings Inc., reimbursement of fees that he may pay to LPL Financial for items such as administrative services, and other things of value such as free or reduced-cost marketing materials, payments in connection with the transition of association from another broker/dealer or investment advisor firm to LPL Financial, advances of advisory fees, or attendance at LPL Financial's national conference or top producer forums and events. LPL Financial may pay your advisor this compensation based on his overall business production and/or on the amount of assets serviced in LPL Investment advisor representative programs. Therefore, the amount of this compensation may be more than what would be received if a client participated in other LPL Financial programs, programs of other investment advisor firms or paid separately for investment advice, brokerage and other client services. Therefore, your advisor has a financial incentive to recommend an advisory program over other programs and services. However, your advisor has a fiduciary duty to only recommend a program or service that is in your best interest.

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## Privacy Policy

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Effective: January 14, 2021

### Our Commitment to You

Van Leeuwen Retirement and Investment Services Retirement and Investment Services ("Van Leeuwen Retirement and Investment Services" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

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

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

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

### Why you need to know?

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

### What information do we collect from you?

Driver's license number	Date of birth
Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number(s)	Income and expenses
E-mail address(es)	Investment activity
Account information (including other institutions)	Investment experience and goals

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

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

### How do we protect your information?

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

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

## How do we share your information?

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

Basis For Sharing	Do we share?	Can you limit?
<b>Servicing our Clients</b> We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, consultants other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
<b>Marketing Purposes</b> Van Leeuwen Retirement and Investment Services does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where Van Leeuwen Retirement and Investment Services or the client has a formal agreement with the financial institution. <b>We will only share information for purposes of servicing your accounts, not for marketing purposes.</b>	No	Not Shared
<b>Authorized Users</b> Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent(s) or representative(s).	Yes	Yes
<b>Information About Former Clients</b> Van Leeuwen Retirement and Investment Services does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

Other Important Information
<b>Information for California, North Dakota, and Vermont Customers</b>  In response to applicable state law, if the mailing address provided for your account is in California, North Dakota, or Vermont, we will automatically treat your account as if you do not want us to disclose your personal information to non-affiliated third parties for purposes of them marketing to you, except as permitted by the applicable state law.

## Changes to our Privacy Policy

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

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

## Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (859) 626-3400 or via email at [mark.vanleeuwen@lpl.com](mailto:mark.vanleeuwen@lpl.com).