

Item 1: Cover Page

Professional Planning Group Form ADV Part 2A Investment Adviser Brochure

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This Brochure provides information about the qualifications and business practices of Professional Planning Group (“we”, “us”, “our”). If you have any questions about the contents of this Brochure, please contact Daniel M. Makin, Associate Compliance Officer at (401) 596-2800 or dmakin@ppgadvisors.com.

Additional information about our Firm is also available on the SEC’s website at <http://adviserinfo.sec.gov/Firm/108868>. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

We are a registered investment adviser. Please note that use of the term “registered investment advisor” and a description of the Firm and/or our employees as “registered” does not imply a certain level of skill or training. For more information on the qualifications of the Firm and our employees who advise you, we encourage you to review this Brochure and the Brochure Supplement(s).

Item 2: Summary of Material Changes

Annual Update

In this Item of New England Professional Planning Group, Inc. dba Professional Planning Group's (PPG or the Firm) Form ADV 2, the Firm is required to discuss any material changes that have been made to Form ADV since the last Annual Amendment, dated March 27, 2020.

Material Changes since the Last Update

Since the last Annual Amendment filing, the Firm has the following Material Changes to report:

- On April 22, 2020, PPG received a loan in the principal amount of \$326,570 in accordance with the coronavirus relief Paycheck Protection Program ("PPP") administered by the Small Business Administration ("SBA"). In accordance with guidance provided by SBA, PPG applied for and was granted full loan forgiveness on December 1, 2020. PPG has not suffered, nor does it expect to suffer, any interruption of service due to the coronavirus pandemic. Further, PPG has not experienced, nor does it expect to experience, conditions that will likely impair any of its ongoing contractual commitments to clients due to the coronavirus pandemic.
- We no longer maintain Third-Party Money Movement Authority for client accounts. Please see Item 15: Custody for more information.
- We hired Michael F. Dembro as our Chief Investment Officer. Please see Item 13: Review of Accounts and Form ADV Part 2B for more information.

Full Brochure Available

PPG's Form ADV may be requested at any time, without charge by contacting Daniel M. Makin, Associate Compliance Officer at (401) 596-2800 or dmakin@ppgadvisors.com.

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Item 4: Advisory Business

Firm Description

PPG is both a registered investment adviser and a branch office of broker/dealer Raymond James Financial Services, Inc. (RJFS), member FINRA/SIPC. Employees may provide advice for an asset-based fee through PPG or sell securities for commission through RJFS. RJFS has a corporate affiliate, Raymond James & Associates, Inc. (RJA) a broker/dealer, member FINRA/SIPC and a registered investment adviser. RJA acts as the clearing agent and facilitates various advisory programs. For further information refer to the Raymond James & Associates Wrap Fee Program Brochure.

Principal Owners

PPG is owned by Malcolm A. Makin, President, Chief Executive Officer and Chief Compliance Officer. PPG and its predecessors were founded in 1975.

Types of Advisory Services

PPG provides discretionary and non-discretionary investment advisory services, financial planning services, a selection of other investment management services and educational workshops/seminars. PPG offers services to individuals, high net worth individuals, profit-sharing plans, trusts, estates, charitable organizations, corporations, endowments and foundations.

Accounts Managed by your Investment Advisor Representative (IAR):

Ambassador

For the Ambassador program, PPG is the advisor providing investment advisory services and RJFS administers the program providing support services for both clients and our financial advisors. Ambassador offers clients the opportunity to (1) maintain full investment authority and direct the individual investments made within their account(s), or (2) delegate investment discretion to their financial advisor.

Accounts Managed by Other Asset Managers:

Freedom

Freedom is an investment advisory program which allocates your assets based upon your financial objectives and risk tolerances through discretionary mutual fund or exchange traded fund management. Your IAR, acting as subadvisor, may assist you in selecting the appropriate Freedom strategy based upon your financial objectives and risk tolerance. You appoint RJA as your investment advisor to select the representative funds and monitor their performance on a continuous basis. Your IAR receives a portion of the asset-based fee.

Raymond James Consulting Service (RJCS)

RJCS is an investment advisory program which allocates your assets based upon your financial objectives and risk tolerances through access to investment management firms at account sizes below typical minimums. Under RJCS you appoint RJA as your investment advisor to select certain portfolio managers, monitor performance, provide other administrative services and assist portfolio managers with certain trading activities. Your IAR, acting as subadvisor, may assist you in selecting the appropriate strategy based upon your financial objectives and risk tolerance. Your IAR receives a portion of the asset-based fee.

Other Services:**Raymond James Trust**

PPG utilizes Raymond James Trust, N.A. which offers personal trust services, including serving as trustee or as an agent or custodian for individual trustees and serves living trusts, charitable remainder trusts, life insurance trusts and specialty trusts. PPG makes recommendations for assets allocations and individual investment transactions required to implement, monitor and adjust the trust portfolio. Raymond James Trust serves as the trustee (or co-trustee) and has final approval on all investment recommendations.

Financial Planning

PPG offers financial planning services. This service reviews aspects of a client's financial situation, which may include cash management, risk management, insurance, education funding, goal setting, retirement planning, estate and charitable giving planning, tax considerations, and capital needs planning.

PPG meets with the client to review risk tolerance, financial goals and objectives and time horizon. Meetings may include a review of additional financial information including sources of income, assets owned, existing insurance, liabilities, wills, trusts, business agreements, tax returns, investments, and personal and family obligations.

The scope of financial planning services may vary and clients should understand that when the scope is limited, the certain financial components may not be taken into consideration.

Wrap Fee Programs

A "wrap-fee" program is one that provides the client with advisory and brokerage execution services for an all-inclusive fee.

PPG offers the Ambassador program where PPG manages the investment portfolio. PPG actively solicits advisory clients for this program and is responsible for marketing the program.

PPG also participates in Freedom and RJCS, both wrap fee programs where you appoint RJA as the subadvisor to manage your investment strategy.

In evaluating the programs, clients should consider that, depending upon the level of the wrap fee charged, the amount of portfolio activity in the client's account, the broker dealer's usual commission rates and other factors, the wrap fee may be more or less than the aggregate cost of such services if they were to be provided separately and if PPG were to negotiate commissions and seek best price and execution of transactions for the client's account.

Tailored Relationships

PPG tailors investment advisory services to the individual needs of the client. The goals and objectives for each client are documented in our client relationship management system. Investment policy statements may be created that reflect the stated goals and objectives.

PPG clients are allowed to impose restrictions on the investments in their account. PPG may accept any reasonable limitation or restriction to discretionary authority placed on the account by the client. All limitations and restrictions must be presented to PPG in writing.

Fiduciary Statement

PPG and its employees are fiduciaries who must take into consideration the best interests of the Firm's clients. PPG will act with competence, dignity, integrity, and in an ethical manner, when dealing with clients. PPG will use reasonable care and exercise independent professional judgement when conducting investment analysis, making investment recommendations, trading, promoting our services, and engaging in other professional activities.

As a fiduciary, PPG has the following responsibilities when working with a client:

- To render impartial advice;
- To make appropriate recommendations based on the client's needs, financial circumstances and investment objectives;
- To exercise a high degree of care and diligence to ensure that information is presented in an accurate manner and not in a way to mislead;
- To have reasonable basis, information, and understanding of the facts in order to provide appropriate recommendations and representations;
- Disclose any material conflict of interest in writing; and
- Treat clients fairly and equitably.

Client Assets

As of December 31, 2020, PPG managed \$971,752,262 in assets under management on a fee basis. Assets managed on a discretionary basis were \$891,151,084 and assets managed on a non-discretionary basis were \$80,601,178.

Item 5: Fees and Compensation

Compensation

PPG bases its fees on a percentage of assets under management, hourly charges, and fixed fees, as described below.

Compensation – Investment Advisory Services

Ambassador

The advisory fees for Ambassador accounts are as follows:

Fee Schedule

Account Value	Annualized Fee
<u>Accounts less than \$1,000,000:</u>	
First \$500,000	1.00%
Amounts over \$500,000	0.75%
Accounts equal to or greater than \$1,000,000	0.75%
Accounts equal to or greater than \$5,000,000	0.50%

A portion of the asset-based advisory fee is paid to RJFS and RJA for administrative services.

Freedom – Independent Managers

The maximum fee charged for Freedom program accounts is 1.25%.

A portion of the asset-based advisory fee is paid to Raymond James for execution, custodial and advisory services.

RJCS – Independent Managers

The maximum fee charged for RJCS is 2%.

A portion of the asset-based advisory fee is paid to Raymond James for execution of advisory services as well as a sub-advisory fee paid to the Managers.

Raymond James Trust

The maximum fee for Raymond James Trust accounts is 1%.

A portion of the asset-based advisory fee is paid to Raymond James Trust.

Compensation – Financial Planning

PPG's financial planning clients are billed in arrears with fees are due and payable upon completion of the engagement. Billing is fixed fee or hourly.

Fixed fee engagements ranging from \$1,000 to \$10,000 depending on the nature and complexity of the client's circumstances, as well as the PPG advisor(s) involved in the planning process.

Hourly fee engagements range from \$100 –\$500 per hour. An estimate for total hours is determined at the start of the advisory relationship and communicated to the client.

Calculation, Payment Agreement Terms of Ambassador, Freedom and RJCS

The annual asset-based fee is charged quarterly in advance. RJFS deducts asset-based fees from the client's account and sends statements reflecting all amounts disbursed from the client's account, including the asset-based fee amount, the value of the assets on which the fee was based and the specific manner in which the fee was calculated.

At account opening, the asset-based fees are billed for the remainder of the current billing period and based on the initial contribution. Upon termination, the client pays an asset-based fee for the period the account was managed prior to notification of termination. If payment was in advance, any unearned fee is refunded.

Charges excluded from the asset-based advisory fee are detailed in the client agreement and reflected on the client statement, as charged. Margined account fees are based on the absolute market value. The use of margin also results in interest charges in addition to other fees and expenses.

PPG is not be compensated on the basis of a share of capital gains or appreciation of the funds or any portion of the client's funds, otherwise known as performance-based fees.

General Information on Compensation and Other Fees

In certain circumstances, asset-based advisory fees and account minimums may be negotiable depending on client's unique situation. Factors considered are the size of the aggregate portfolio, family holdings or pre-existing relationships with clients. Client accounts may be linked for purposes of fee calculation, meaning certain accounts may be grouped for fee calculations.

All fees paid to us for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other expenses, and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge.

Financial planning service fees may vary. Factors considered in fees are the amount of assets, type of portfolio, time commitment, complexity and skill / knowledge needed for the client engagement.

Certain employees are registered representatives of the broker/dealer RJFS. As registered representatives, compensation for the sale of securities and other investment products is accepted. Commissions and other sales-related compensation are not PPG's primary compensation. This practice presents a conflict of interest as these employees may have an incentive to recommend investment products based on the compensation received rather than on a client's needs. PPG mitigates this conflict by following a Code of Ethics, which places the clients' interests first.

Employees of PPG are entitled to lower management fee arrangements for their personal accounts.

Fees and Expenses (Mutual Funds Share Class Selection)

Funds generally offer multiple share classes available for investment based upon certain eligibility and/or purchase requirements. For instance, in addition to retail share classes (typically referred to as class A, class B and class C shares), funds may also offer institutional share classes or other share classes that are specifically designed for purchase by investors who meet certain specified eligibility criteria, including, account minimums amount thresholds or enrollment in an eligible fee-based investment advisory program. Institutional share classes usually have a lower expense ratio than other share classes.

PPG and its IARs who are dually registered have a financial incentive to recommend or select share classes that have a 12b-1 fee because such share classes generally result in higher compensation. This creates a conflict of interest.

The Firm has taken steps to minimize conflicts of interest, including (1) providing its IARs with guidance on this issue, as well as (2) conducting periodic reviews of client holdings in mutual fund investments to ensure the appropriateness of mutual fund share class selections and whether alternative mutual fund share class selections are available that might be more appropriate given the client's particular investment objectives and/or any other appropriate considerations relevant to mutual fund share class selection. Regardless of such considerations, clients should not assume that they will be invested in the share class with the lowest possible expense ratio.

The appropriateness of a particular fund share class selection is dependent upon a range of different considerations, including but not limited to: (1) the asset-based advisory fee that is charged, (2) whether transaction charges are applied to the purchase or sale of funds, (3) operational considerations associated with accessing or offering particular share classes (including the presence of selling agreements with the fund sponsors and PPG's ability to access particular share classes through the custodian), (4) share class eligibility requirements and (5) the availability of revenue sharing, distribution fees, shareholder servicing fees or other compensation associated with offering a particular class of shares

Fees and Expenses (12b-1 fees)

Client accounts may hold shares of investment companies, including money market funds, open end funds, closed-end funds, and/or exchange-traded funds. In addition to assessing the advisory fee, these funds assess other internal expenses, including 12b-1 fees or “trails”, administrative and other expenses. Rule 12b-1 fees and other fees are typically disclosed in the applicable fund’s prospectus. Funds may make payments to the Firm or IARs of PPG, pursuant to a Rule 12b-1. RJFS automatically refunds client accounts with any 12b-1 fees charged during the period the account is managed by the Firm.

PPG uses its best efforts to purchase lower cost fund shares but in certain instances cannot because the fund company does not offer institutional class non-12b-1 fee paying funds.

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

Neither PPG nor any of its employees accepts performance-based fees or participate in any side-by-side management.

Performance-based fee arrangements involve the payment of fees based on a share of capital gains or capital appreciation of a client's account. PPG does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees.

Item 7: Types of Clients

Types of Clients

PPG's clients include individuals, high net worth individuals, profit-sharing plans, trusts, estates, charitable organizations, corporations, endowments and foundations.

Account Minimums

PPG requires a minimum account of \$500,000 for investment advisory services, although this may be negotiable under certain circumstances. Waivers or exceptions from the minimum account requirement for investment advisory accounts may be granted at the exclusive discretion of PPG.

The minimum investment for Ambassador and Freedom is \$25,000, and for RJCS ranges from \$100,000 to \$1,000,000 depending on account type.

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

Methods of Analysis

PPG employs fundamental and technical analysis when evaluating securities for potential investments.

Fundamental Analysis. PPG attempts to measure the intrinsic value of a security by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management of the company itself) to determine if the company is underpriced (indicating it may be a good time to buy) or overpriced (indicating it may be time to sell).

Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.

Technical Analysis. PPG analyzes past market movements and applies that analysis to the present in an attempt to recognize recurring patterns of investor behavior and potentially predict future price movement.

Technical analysis does not consider the underlying financial condition of a company. This presents a risk in that a poorly managed or financially unsound company may underperform regardless of market movement.

Investment Strategies

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time.

Strategies may include long-term purchases, short-term purchases, short sales, margin transactions, and option writing (including covered options, uncovered options or spread strategies).

PPG reserves the right to advise clients on any other type of investment that it deems appropriate based on the client's stated goals and objectives. PPG may also provide advice on any type of investment held in a client's portfolio at the inception of the advisory relationship or on any investment on which the client requests advice.

Risk of Loss

Investing in securities involves risk of loss that clients should be prepared to bear.

All investments involve the risk of loss, including (among other things) loss of principal, a reduction in earnings (including interest, dividends and other distributions), and the loss of future earnings. Although we manage assets in a manner consistent with your investment

objectives and risk tolerance, there can be no guarantee that our efforts will be successful. You should be prepared to bear the following risks of loss:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar next year will not buy as much as a dollar today, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.
- **Cybersecurity Risk:** A breach in cyber security refers to both intentional and unintentional events that may cause an account to lose proprietary information, suffer data corruption, or lose operational capacity. This in turn could cause an account to incur regulatory penalties, reputational damage, and additional compliance costs associated with corrective measures, and/or financial loss.
- **Pandemic Risk:** Large-scale outbreaks of infectious disease can greatly increase morbidity and mortality over a wide geographic area, crossing international boundaries, and causing significant economic, social, and political disruption.

Item 9: 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 PPG or the integrity of PPG's management.

PPG has no information to disclose applicable to this Item.

Item 10: Other Financial Industry Activities and Affiliations

Financial Industry Activities

PPG is not registered as a broker/dealer. Several of its employees are registered representatives of the broker/dealer RJFS.

Neither PPG nor any of its management persons is registered as (or associated with) a futures commissions merchant, commodity pool operator, or a commodity trading advisor.

Affiliations – Broker-Dealer Registered Representatives

Certain PPG's employees are registered representative(s) of RJFS. Notwithstanding that fact, principals and associates of PPG are solely responsible for investment advice rendered. Advisory services are provided separately and independently of the broker/dealer. This relationship could create a material conflict of interest with clients.

Other Affiliations

As described in Item 5 and Item 12, employees of PPG may provide advice for an asset-based fee or sell securities for commission as Registered Representatives of the broker/dealer RJFS. RJFS is required to supervise the securities trading activities of its Registered Representatives. IARs may recommend RJFS to advisory clients for brokerage services.

IARs may also be appointed with several insurance companies. IARs may be able to receive separate compensation for securities and/or insurance transactions through RJFS and various insurance companies. Clients are not obligated to utilize any of these services for insurance or security product purchases. All clients are free to maintain relationships with other professionals such as insurance agents or securities brokers outside or, or in addition to their relationship with PPG.

Insurance, annuity and/or security compensation will be separate and distinct from investment management fees and financial planning fees charged by PPG.

Joanna E. Valentini is a Certified Public Accountant. She does not practice accounting outside of her role as PPG's Chief Operating Officer.

Other Investment Advisors

As described in Item 4, PPG may select other investment advisors for its clients and may receive compensation from those advisors.

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

Code of Ethics

PPG employees must comply with a Code of Ethics and Statement for Insider Trading (the Code). The Code describes the Firms' high standard of business conduct, and fiduciary duty to its clients. The Code's key provisions include:

- Statement of General Principles
- Policy on and reporting of Personal Securities Transactions
- A prohibition on Insider Trading
- Restrictions on the acceptance of significant gifts
- Procedures to detect and deter misconduct and violations
- Requirement to maintain confidentiality of client information

Employee trades are reviewed each quarter. These reviews ensure that personal trading does not affect the markets, and that clients of PPG receive preferential treatment.

PPG's employees must acknowledge the terms of the Code at least annually. Any individual not in compliance with the Code may be subject to disciplinary action including termination. Clients and prospective clients can obtain a copy of PPG's Code by contacting Daniel M. Makin, Associate Compliance Officer, at (401) 596-2800 or dmakin@ppgadvisors.com.

Participation or Interest in Client Transactions

IARs of PPG are also registered representatives of RJFS and may be involved in the sale of securities of various types (including, but not limited to, stocks, bonds, and mutual funds) for which IARs receive commissions. IARs are may also be involved in the sale of various insurance products. The time spent in such capacities varies.

Participation or Interest in Client Transactions – Personal Securities Transactions

PPG and its employees may buy or sell the same securities as those recommended to clients for their personal accounts. The Code is designed to assure that personal securities transactions, activities and interests of PPG employees will not interfere with (1) making decisions in the best interest of advisory clients and (2) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Employee trading is continuously monitored and designed to reasonably prevent conflicts of interest between PPG and its clients as there is a possibility that employees might benefit from market activity by a client in a security held by an employee.

The Code designates certain classes of securities, primarily mutual funds, as exempt transactions based upon a determination that these would not materially interfere with

determining what is in the best interest of PPG's clients. In addition, the Code requires pre-clearance of many transactions.

Participation or Interest in Client Transactions – Financial Interest and Principal/Agency Cross

PPG and its employees do not recommend to clients, or buy or sell for client accounts, securities in which they have a material financial interest.

It is PPG's policy that the Firm will not affect any principal or agency cross securities transactions for client accounts. PPG will also not cross trades between client accounts.

Participation or Interest in Client Transactions – Aggregation

PPG employees may trade in the same securities with client accounts on an aggregated basis when consistent with PPG's obligation of best execution. In such circumstances, the employee and client accounts will share transaction costs equally and receive securities at a total average price. PPG will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained on the order.

Item 12: Brokerage Practices

Research and Other Soft Dollar Benefits

PPG does not receive formal soft dollar benefits. We do receive other economic benefits as disclosed below.

Brokerage for Client Referrals

PPG does not purchase client referrals from broker/dealers.

Directed Brokerage

PPG generally has limited power of attorney to act on a discretionary basis on behalf of clients. When such limited powers exist between the client and PPG, PPG may choose both the amount and type of publicly traded securities to be bought to satisfy account objectives. This is the case with most of PPG's clients. Additionally, PPG accepts any reasonable client limitation or restriction to such authority presented to PPG in writing.

Registered Representatives of RJFS are subject to FINRA Conduct Rule 3280 that restricts them from conducting securities transactions away from RJFS. Therefore, clients are advised that IARs are limited to conducting securities transactions through RJFS. RJFS may charge a higher or lower fee than another broker charges for a particular type of service, such as transaction fees. Clients may utilize the broker dealer of their choice and have no obligation to purchase or sell securities through RJFS. However, if the client does not use RJFS, the IAR will reserve the right not to accept the account. As a registered FINRA broker/dealer, RJFS routes order flow through its affiliate RJA. RJA is obligated to seek best execution pursuant to FINRA Rule 5310 for all trades executed, however better executions may be available via another broker dealer based on a number of factors including volume, order flow and market making activity.

While it is possible that clients may pay higher commission or transaction fees through RJFS, PPG has determined that RJFS currently offers the best overall value to PPG and its clients for the customer service, brokerage, research services and technology it provides. PPG believes these qualities make RJFS superior to most non-service oriented, deep-discount and internet/web-based brokers that may otherwise be available to the public.

Directed Brokerage – Other Economic Benefits

RJFS provides benefits such as (1) customized statements, (2) receipt of duplicate client confirmations and bundled duplicate statements, (3) access to a trading desk servicing RJFS advisors exclusively, (4) access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to client accounts, (5) ability to have investment advisory fees deducted directly from client accounts, (6) access to an electronic communication network for client order entry and account information, (7) access to mutual funds which generally require significantly high minimum initial investments or those that are otherwise only generally available to institutional investors, (8) reporting features, (9) receipt of industry communications and (10) perhaps discounts on business-related products.

RJFS may also provide general access to research and perhaps discounts on research products. Any research received is used for the benefit of all clients. RJFS may offer incentives such as the ability to attend industry related conferences or other benefits. PPG does not believe that such incentives impair PPG's independence.

While PPG endeavors at all times to put the interest of the clients first as part of PPG's fiduciary duty, clients should be aware that the receipt of additional compensation itself creates a conflict of interest and may affect judgment when making recommendations.

Other third-party service providers and/or insurance companies may also provide benefits to PPG and its IARs. PPG believes these items have no material value and do not, either individually or collectively, impair PPG's independence.

Wrap Fee Programs and Related Brokerage

As disclosed in Item 4, clients may participate in wrap fee programs.

In wrap fee programs, trades are generally expected to be executed only with the broker/dealer with which the client has entered into the wrap fee arrangement. PPG may not be free to seek best price and execution by placing transactions with other broker/dealers. PPG's experience indicates that wrap fee agreements generally offer best price for transactions. The client may wish to ensure that the broker/dealer offering the wrap-fee arrangement can provide adequate price and execution of most or all transactions.

The client should consider that depending on the all-inclusive wrap-fee charged by the broker/dealer, the amount of portfolio activity in the client's account, the value of custodial and other services which are provided under the arrangement, and other factors, the wrap-fee may or may not exceed the aggregate cost of such services were they to be provided separately and if the firm were free to negotiate commissions and seek best price and execution of transactions for the client's account.

A client's total cost of each of the services provided through wrap fee programs, if purchased separately, could be more or less than the costs of each respective program. Cost factors may include the client's ability to:

- obtain the services provided within the programs separately with respect to the selection of mutual funds,
- invest and rebalance the selected mutual funds without the payment of a sales charge, and
- obtain performance reporting comparable to those provided within each program.

The IAR may have a financial incentive to recommend a particular account program over another. The IAR may recommend an asset-based fee advisory program as a portion of the annual advisory fee is paid to the IAR, which may be more than the IAR would receive if the

client paid for investment advisory services, brokerage, performance reporting and other services separately.

IARs do not receive financial incentive to recommend and sell proprietary versus non-proprietary mutual funds. However, since the compensation structures vary by product type, IARs may receive higher compensation for certain product types. IARs may receive incentive compensation for utilizing a particular account program.

PPG believes the charges and fees offered within each fee-based program are competitive with alternative programs available through other firms and/or investment sources yet makes no guarantee that the aggregate cost of a particular program is lower than that which may be available elsewhere.

Trade Aggregation

PPG may aggregate trades for multiple accounts. Orders for the same security entered on behalf of more than one client will generally be aggregated (i.e., blocked or bunched) subject to the aggregation being in the best interests of all participating clients. If the order is filled at different prices during the day, the prices are averaged for the day so that all participating accounts receive the same price. All clients participating in each aggregated order shall receive the average price and subject to minimum ticket charges, pay a pro-rata portion of commissions. If an order has not been filled completely shares will be allocated in good faith. PPG's allocation procedure seeks to be fair and equitable to all clients with no particular client being favored over any other. Accounts for PPG or its employees may be included in a block trade with client accounts.

Item 13: Review of Accounts

Reviews

Malcolm A. Makin, President, Chief Executive Officer and Chief Compliance Officer, is responsible for overseeing all reviews. Malcolm A. Makin and Michael F. Dembro, Chief Investment Officer, monitor and manage the securities in the Firm's portfolios.

Each client is assigned an IAR. IARs include Christopher G. Wallace, Daniel M. Makin, Peter C. Wallace, Eileen M. Esposito, Patrick J. Connelly, and Giancarlo Pannone. The IAR typically works with the client to establish investment goals, objectives and understand risk tolerance as applicable to the client's investment portfolio. The IAR generally covers the following areas: a review of the client's circumstances, the purpose of the portfolio, time horizon, portfolio goals, tax considerations, investment policy objectives, anticipated liquidity needs, investment philosophy, asset allocation, investment selection, constraints, risk tolerance, monitoring intervals, and portfolio loans, as applicable.

PPG's IARs monitor client accounts continuously and perform a more detailed review of client accounts periodically. These reviews typically include comparing the portfolio with the client's goals and objectives, reviewing changes to the client's investment circumstances, evaluating the specific holdings, re-balancing the portfolio and communicating the status of the portfolio to the client.

PPG encourages frequent client contact. Clients are obligated to promptly notify PPG of any changes in the client's financial status to ensure that investment strategies continue to meet the client's changing needs.

Review Triggers

Other conditions that may trigger a review are changes in market, political or economic conditions, tax laws, new investment information, and changes in a client's own situation.

Reporting

Clients receive holding and activity reports at least quarterly from our custodial and brokerage firm. PPG may periodically prepare reports or communications related to investment advisory or financial planning services provided.

Financial Planning – Reviews and Reporting

An initial financial plan may be included as a component of the financial planning process. At the client's request, PPG may review and/or update financial plans that are not implemented upon presentation. Such reviews and/or updates may be subject to PPG's current hourly rate.

Item 14: Client Referrals and Other Compensation

Compensation – Brokerage Arrangements

PPG requires that clients establish brokerage accounts with RJFS, who maintains custody of client assets and to effect trades on their accounts. Although PPG requires that clients establish accounts at RJFS, it is the client's decision.

Other Compensation – Economic Benefits

See disclosure in Item 12 regarding compensation, including economic benefits.

Compensation – Client Referrals

PPG does not make or accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

Item 15: Custody

Custody – Fee Debiting

PPG has custody as we are authorized in client agreements to debit fees directly from the client's account, held at the qualified custodian, Raymond James. Raymond James is advised in writing of the limitation of PPG's access to the account. Raymond James sends a statement to the client, at least quarterly, indicating all amounts disbursed from the account including the amount of advisory fees paid directly to PPG.

Custody – Account Statements

As described above and in Item 13, clients receive statements, at least quarterly, from Raymond James who holds and maintains client's investment assets. Clients should carefully review statements and compare this official custodial record to account statements or other reports provided by PPG. PPG reports may vary from Raymond James statements due to reporting dates or valuation methodologies of certain securities.

Item 16: Investment Discretion

Through the client agreement, PPG may accept limited power of attorney to act on a discretionary basis on behalf of clients. A limited power of attorney allows PPG to execute trades on behalf of clients.

When such limited powers exist between PPG and the client, PPG has the authority to determine, without obtaining specific client consent, both the amount and type of securities to be bought to satisfy client account objectives. Additionally, PPG may accept any reasonable limitation or restriction to such authority on the account placed by the client. All limitations and restrictions placed on accounts must be presented to PPG in writing.

For non-discretionary accounts, PPG consults with the client prior to each trade to obtain concurrence.

Item 17: Voting Client Securities

PPG does not have any authority to and does not vote proxies on behalf of clients. Clients retain the responsibility for receiving and voting proxies which they receive directly from either custodians or transfer agents.

If requested, PPG may provide advice to clients regarding proxy votes. If any conflict of interest exists, it will be disclosed to the client. Clients may contact Daniel M. Makin, Associate Compliance Officer, at (401) 596-2800 or dmakin@ppgadvisors.com for information about proxy voting.

Item 18: Financial Information

PPG is not required to provide a balance sheet. PPG does not require prepayment of fees of both more than \$1,200 per client, **and** more than six months in advance.

On April 22, 2020, PPG received a loan in the principal amount of \$326,570 in accordance with the coronavirus relief PPP program administered by the SBA. In accordance with guidance provided by SBA, PPG applied for and was granted full loan forgiveness on December 1, 2020. PPG has not suffered, nor does it expect to suffer, any interruption of service due to the coronavirus pandemic. Further, PPG has not experienced, nor does it expect to experience, conditions that will likely impair any of its ongoing contractual commitments to clients due to the coronavirus pandemic.

PPG has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy proceeding.

Form ADV Part 2B – Investment Adviser Brochure Supplement

Professional Planning Group **Form ADV Part 2B** **Investment Adviser Brochure Supplement**

9 Granite Street
Westerly, RI 02891
(401) 596-2800
www.ppgadvisors.com

Supervisor's Name: Malcolm A. Makin, President, Chief Executive Officer and Chief Compliance Officer

Supervisor of:
Joanna E. Valentini
Michael F. Dembro
Christopher G. Wallace
Daniel M. Makin
Peter C. Wallace
Eileen M. Esposito
Patrick J. Connelly
Giancarlo Pannonne

March 2021

This Brochure Supplement provides information about the Firm's ("we", "us", "our") employees that supplements our Brochure. You should have received a copy of that Brochure. Please contact Daniel M. Makin, Associate Compliance Officer at (401) 596-2800 or dmakin@ppgadvisors.com if you did not receive our Brochure or if you have any questions about the contents of this Supplement.

Additional information about our employee(s) referenced above is also available on the SEC's website at www.adviserinfo.sec.gov. You may search this site using a unique identifying number, known as a CRD number for each employee.

Item 2: Educational Background and Business Experience

Education and Business Background

PPG requires a college degree and/or extensive experience in financial services as a minimum standard for professionals. Professionals may have also attained or be in the process of completing a post-graduate financial advisory designation/certification, such as CFP[®], CFA[®] or CPA.

Supervised Persons

Malcolm A. Makin

Born 1944

CRD #: 851143

Business Background:

New England Professional Planning Group, Inc.

1975 to Present

dba Professional Planning Group

President, Chief Executive Officer and Chief Compliance Officer

Executive Board: Chairman

Investment Committee: Co-Chairman

Compliance Committee: Chairman

Raymond James Financial Services, Inc.

1989 to Present

Financial Advisor, Registered Principal, Branch Manager

Formal Education after High School:

Nyack College

Bachelor of Arts in Liberal Arts

New School for Social Research

College for Financial Planning

Professional Designations:

Certified Financial Planner[™] (CFP[®])

Joanna E. Valentini

Born 1969

CRD #: 6892433

Business Background:

New England Professional Planning Group, Inc.

2017 to Present

dba Professional Planning Group

Chief Operating Officer

Executive Board: Vice Chair

Investment Committee: Member

Compliance Committee: Member

The Washington Trust Company
Vice President, Assistant Controller

2004 to 2018

Formal Education after High School:

University of Rhode Island
Bachelor of Science in Business Administration
Concentration in Accounting

Professional Designations:

Certified Public Accountant (CPA)

Michael F. Dembro

Born 1981

CRD #: 5918707

Business Background:

New England Professional Planning Group, Inc.
dba Professional Planning Group
Chief Investment Officer
Executive Board: Member
Investment Committee: Co-Chairman
Compliance Committee: Member

2020 to Present

Raymond James Financial Services, Inc.
Registered Representative

2020 to Present

Natixis Global Associates
Vice President, Portfolio Consultant

2011 to 2020

Formal Education after High School:

Boston College
Master of Business Administration
Master of Science in Finance

Brandeis University
Bachelor of Science in Economics

Harvard Business School
Boston Leader Program

Professional Designations:

None

Christopher G. Wallace

Born 1968

CRD #: 2396712

Business Background:

New England Professional Planning Group, Inc. 2002 to Present
dba Professional Planning Group
Financial Advisor
Executive Board: Member
Investment Committee: Co-Chairman
Compliance Committee: Member

Raymond James Financial Services, Inc. 2002 to Present
Financial Advisor and Registered Principal

Mellon Financial Corporation 1997 to 2002
Vice President and Portfolio Manager

Formal Education after High School:

Hobart College
Bachelor of Arts in Economics with Honors Distinction

Williams College
Graduate of the New England School of Banking's Trust
and Estate Planning Program

Professional Designations:

Chartered Financial Analyst® (CFA®)

Daniel M. Makin

Born 1969

CRD #: 4367894

Business Background:

New England Professional Planning Group, Inc. 2000 to Present
dba Professional Planning Group
Associate Compliance Officer
Financial Advisor
Executive Board: Member
Investment Committee: Member
Compliance Committee: Member

Raymond James Financial Services, Inc. 2000 to Present
Financial Advisor and Registered Principal

Formal Education after High School:

Alfred University
Bachelor of Arts in Management and Finance

Professional Designations:

Certified Financial Planner™ (CFP®)

Certified Investment Management Analyst (CIMA®)

Peter C. Wallace

Born 1970

CRD #: 2320579**Business Background:**

New England Professional Planning Group, Inc.

1998 to Present

dba Professional Planning Group

Financial Advisor

Executive Board: Member

Investment Committee: Member

Raymond James Financial Services, Inc.

1998 to Present

Financial Advisor

Massachusetts Financial Services

1994 to 1998

Retirement Sales Representative

Formal Education after High School:

Hartwick College

Bachelor of Arts in Human Resources Management

Professional Designations:None

Eileen M. Esposito

Born 1960

CRD #: 2524399**Business Background:**

New England Professional Planning Group, Inc.

1996 to Present

dba Professional Planning Group

Financial Advisor

Raymond James Financial Services, Inc.

1996 to Present

Financial Advisor

Dean Witter Reynolds, Inc.

1994 to 1996

Financial Advisor

Formal Education after High School:

University of Rhode Island

Master of Business Administration

Bachelor of Science in Natural Resources

Professional Designations:

None

Patrick J. Connelly

Born 1992

CRD #: 5934645

Business Background:

New England Professional Planning Group, Inc.
dba Professional Planning Group
Financial Advisor

2019 to Present

Raymond James Financial Services, Inc.
Financial Advisor

2019 to Present

Pioneer Financial Group
Financial Advisor

2015 to 2019

Minnesota Life Insurance Company
Agent

2015 to 2019

Securian Financial Services, Inc.
Registered Representative

2015 to 2019

Formal Education after High School:

University of New Hampshire
Bachelor of Science in Business Administration
Concentration in Finance and Accounting

Professional Designations:

None

Giancarlo Pannone

Born 1989

CRD #: 6490914

Business Background:

New England Professional Planning Group, Inc.
dba Professional Planning Group
Financial Advisor

2020 to Present

Raymond James Financial Services, Inc.
Financial Advisor

2020 to Present

Bank of America, Merrill Lynch
Financial Solutions Advisor

2015 to 2020

Formal Education after High School:

Rhode Island College
Bachelor of Arts in Public and Professional Communication

Professional Designations:

None

Professional Certifications

Our Supervised Persons maintain professional designations, which required the following minimum requirements:

Certified Financial Planner™ (CFP®)

Issued by: Certified Financial Planner Board of Standards, Inc.

Prerequisites/Experience Required: Candidate must meet the following requirements:

- A bachelor's degree (or higher) from an accredited college or university, and
- 3 years of full-time personal financial planning experience

Educational Requirements: Candidate must complete a CFP-board registered program, or hold one of the following:

- CPA
- ChFC
- Chartered Life Underwriter (CLU)
- CFA
- Ph.D. in business or economics
- Doctor of Business Administration
- Attorney's License

Examination Type: CFP Certification Examination

Continuing Education/Experience Requirements: 30 hours every 2 years

Chartered Financial Analyst (CFA)

Issued by: CFA Institute

Prerequisites/Experience Required: Candidate must meet one of the following requirements:

- Undergraduate degree and 4 years of professional experience involving investment decision-making, or
- 4 years qualified work experience (full time, but not necessarily investment related)

Educational Requirements: Self-study program (250 hours of study for each of the 3 levels)

Examination Type: 3 course exams

Continuing Education/Experience Requirements: None

Certified Investment Management Analyst (CIMA®)

Issued by: Investment Management Consultants Association (IMCA)

Prerequisites/Experience Required: Candidate must meet the following requirements:

- 3 years of full-time financial services experience
- Pass Qualification Examination
- Complete education program with an AACSB accredited university business school
- Pass online Certification Examination
- Have an acceptable regulatory history as evidenced by FINRA Form U-4 or other regulatory requirements
- Sign licensing agreement and agree to adhere to IMCA's Code of Professional Responsibility, Standards of Practice, and Rules and Guidelines for Use of the Marks

Educational Requirements: Candidates are required to complete an in-person or online executive education program at an AACSB accredited university business school

Examination Type: Qualification and Certification Examinations

Continuing Education/Experience Requirements: 40 hours every 2 years, including 2 ethics hours

Certified Public Accountant (CPA)

Issued by: State Boards of Accountancy

Prerequisites/Experience Required: Candidate must meet the following requirements:

- Minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA)

Educational Requirements:

- At minimum, a college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting)

Examination Type: Uniform CPA Examination

Continuing Education/Experience Requirements: Completion of 40 hours of continuing professional education each year, including ethics (or 120 hours over a three -year period) in order to maintain a CPA license

Item 3: Disciplinary Information

Neither PPG nor any Supervised Persons have been involved in any activities resulting in a disciplinary disclosure.

Item 4: Other Business Activities

Disclosure on Outside Business Activities is provided in Form ADV Part 2A Item 10 – Other Financial Industry Activities and Affiliations. These Outside Business Activities do not create a material conflict of interest with clients.

Several of PPG’s Supervised Persons are actively engaged in other Outside Business Activities:

Malcolm A. Makin, Daniel M. Makin, Christopher G. Wallace, Peter C. Wallace, Eileen M. Esposito, Patrick J. Connelly and Giancarlo Pannone are licensed as life insurance sales agents. They are also Registered Representatives of RJFS.

Joanna E. Valentini is a Certified Public Accountant. She does not practice accounting outside of her role as Chief Operating Officer for the Firm.

Item 5: Additional Compensation

No Supervised Person receives any formal economic benefit outside of an annual salary. Certain Supervised Persons are eligible for payments on a percentage of future revenues generated by additional assets from new and existing clients and certain others also are compensated on a percentage of our firm’s overall profits. In addition, we may pay our financial professionals a discretionary bonus each year.

Item 6: Supervision

Malcolm A. Makin, President, Chief Executive Officer and Chief Compliance Officer, supervises all persons named in this Form ADV Part 2B Investment Adviser Brochure Supplement. Malcolm A. Makin supervises these persons by holding regular staff, investment, compliance and other ad hoc meetings. In addition, Malcolm A. Makin or his delegates, regularly reviews client reports, emails, and trading, as well as employees' personal securities transactions and holdings reports. Malcolm A. Makin may be reached at (401) 596-2800 or mmakin@ppgadvisors.com.