



**Strategic Financial Planning, Inc.
6513 Preston Road
Suite 100
Plano, Texas 75024**

**Phone: 972-403-1234
Fax: 866-776-2297
Web Site: www.strategicfp.com**

March 31, 2021

BY APPOINTMENT ONLY

**FORM ADV PART 2A
BROCHURE**

Form ADV Part 2A, Item 1

This brochure provides information about the qualifications and business practices of Strategic Financial Planning, Inc. If you have any questions about the contents of this brochure, please contact us at 972-403-1234. The information in this brochure has not been approved or verified by the Securities and Exchange Commission, Texas State Securities Board or by any securities authority.

Additional information about Strategic Financial Planning, Inc. is also available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Strategic Financial Planning, Inc. is 118450.

Registration with any securities authority does not imply a certain level of skill or training.

Item 2: Material Changes

At least annually, this section will discuss only specific material changes that are made to the Strategic Financial Planning, Inc. Brochure and provide you with a summary of such changes. Additionally, reference to the date of the last annual update to this Brochure will be provided.

Since our last amendment filed on December 18, 2020, there have been no material changes made to Strategic Financial Planning Inc's ("SFP") Brochure except for registration transition from the State of Texas to the SEC on January 19, 2021. However, many disclosure additions and enhancements have been made throughout this Brochure, including at Items 4, 5, 10, 12, 14, and 15 regarding financial planning limitations, retirement rollovers, fee dispersion, conflicts of interest, brokerage arrangements, and custody. **ANY QUESTIONS:** SFP's Chief Compliance Officer, Bryan Lee, remains available to address any questions regarding the above changes, or any other issue pertaining to this Brochure.

A copy of our Brochure may be requested by contacting us at 972-403-1234 and/or info@strategicfp.com.

Additional information about Strategic Financial Planning, Inc. is also available via the SEC's website www.adviserinfo.sec.gov. The IARD number for Strategic Financial Planning, Inc. is 118450. The SEC's website also provides information about any persons affiliated with Strategic Financial Planning, Inc. who are registered, or are required to be registered, as Advisory Representatives of Strategic Financial Planning, Inc.

Item 3: Table of Contents

Item 1: Cover Page	1
Item 2: Material Changes	2
Item 3: Table of Contents	3
Item 4: Advisory Business	4
Item 5: Fees and Compensation	7
Item 6: Performance-Based Fees and Side-By-Side Management	9
Item 7: Types of Clients	10
Item 8: Methods of Analysis, Investment Strategies, and Risk of Loss	10
Item 9: Disciplinary Information	10
Item 10: Other Financial Industry Activities and Affiliations	11
Item 11: Code of Ethics, Participation or Interest in Client Transactions, and Personal Trading	11
Item 12: Brokerage Practices	12
Item 13: Review of Accounts	13
Item 14: Client Referrals and Other Compensation	13
Item 15: Custody	15
Item 16: Investment Discretion	15
Item 17: Voting Client Securities	15
Item 18: Financial Information	16
Additional Information	16

Item 4: Advisory Business

Bryan Keith Lee (CRD Number 2444953) is President and Chief Compliance Officer of Strategic Financial Planning, Inc. Mr. Lee owns one hundred (100%) percent of the equity of the firm. The firm is not publicly owned or traded. There are no indirect owners of the firm or intermediaries, which have any ownership interest in the firm. As of December 31, 2020, the firm managed, on a discretionary basis, \$142,499,777 which represented 487 accounts. Client assets are managed on an individualized basis. Clients may impose restrictions on their accounts. The firm does not sponsor any wrap programs.

Introduction

Strategic Financial Planning, Inc. ("SFP") offers an array of advisory services designed to address the major areas of personal wealth management including, but not limited to, investment portfolio management, cash-flow analysis, and investment management evaluation. SFP provides financial planning advice, services, and recommendations and before doing so may confer with Client and/or Client's other advisors; however, SFP does manage client portfolios on a discretionary basis. The Client is always free to accept or reject any advice or recommendations, in whole or in part.

SFP will work to make sure all reasonable client expectations are met. Termination of the contract will be allowed with 30 days' notice if the client is not satisfied for any reason. Fees earned up to that point and including the following 30 days will have been earned by SFP and shall be paid by the client.

Initial Planning

Upon commencement of the engagement, SFP will provide financial planning and related consulting services regarding non-investment related matters, such as tax and estate planning, insurance, etc. per the terms and conditions of the *Financial Planning & Investment Advisory Agreement* as discussed at Item 5 below, the fee for which (generally between \$3,000 and \$12,000) shall be based upon the complexity and the scope of the planning and consulting services to be provided. Prior to engaging SFP to provide planning or consulting services, clients are generally required to enter into a *Financial Planning & Investment Advisory Agreement* with SFP setting forth the terms and conditions of the engagement (including termination), describing the scope of the services to be provided, and the portion of the fee that is due from the client prior to SFP commencing services.

Wealth Management

Upon completion of the initial financial plan, the client can engage SFP to provide ongoing discretionary investment advisory services on a *fee-only* basis. Provided that the client has first separately engaged SFP for the above referenced initial financial planning services, SFP's quarterly investment advisory fee for wealth management services shall include investment advisory services, and, to the extent requested by the client, financial planning and consulting

services. This fee is billed quarterly in arrears. In the event that the client requires extraordinary planning and/or consultation services (to be determined in the sole discretion of SFP), SFP may determine to charge for such additional services, the dollar amount of which shall be set forth in a separate written notice to the client. **Please Note**. SFP believes that it is important for the client to address financial planning issues on an ongoing basis. SFP's advisory fee, as set forth at Item 5 below, will remain the same regardless of whether or not the client determines to address financial planning issues with SFP.

To commence the investment advisory process, SFP will ascertain each client's investment objective(s) and then allocate the client's assets consistent with the client's designated investment objective(s)/target asset allocation. Once allocated, SFP provides ongoing supervision of the account(s). Before engaging SFP to provide investment advisory services, clients are required to enter into a *Financial Planning & Investment Advisory Agreement* with SFP setting forth the terms and conditions of the engagement (including termination), describing the scope of the services to be provided, and the fee that is due from the client.

As part of SFP's ongoing wealth management services, Clients receive statements from Custodian at least quarterly detailing account values, deposit and withdrawal activity, and the amount of wealth management fee assessed each quarter. Clients are encouraged to review these statements upon receipt. During the first quarter of each year, the Custodian provides 1099's in order to aid in the tax preparation process.

In addition to financial planning and portfolio management, SFP may also at times:

- Provide consultation on pension services to businesses regarding selection of plan and/or investments, in which SFP may be compensated as a flat fee or on-going wealth management fee as listed below
- Host educational programs
- Select other advisors if need determined, in which no compensation from other advisors will be received

Additional services are provided as part of the ongoing wealth management fee or charged at a fixed rate.

Miscellaneous

Limitations of Financial Planning and Non-Investment Consulting/Implementation

Services. SFP **does not** serve as an attorney, accountant, or insurance agent, and no portion of our services should be construed as same. Accordingly, SFP **does not** prepare legal documents, prepare tax returns, or sell insurance products. To the extent requested by a client, we may recommend the services of other professionals for non-investment implementation purpose (i.e. attorneys, accountants, insurance, etc.). The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from SFP and/or its representatives. If the client engages any professional (i.e. attorney, accountant, insurance agent, etc.), recommended or otherwise, and a dispute arises thereafter relative to such engagement, the client agrees to seek recourse exclusively from the engaged professional. At all times, the

engaged licensed professional[s] (i.e. attorney, accountant, insurance agent, etc.), and **not** SFP, shall be responsible for the quality and competency of the services provided.

Please Note: Retirement Rollovers-Potential for Conflict of Interest: A client or prospective client leaving an employer typically has four options regarding an existing retirement plan (and may engage in a combination of these options): (i) leave the money in the former employer's plan, if permitted, (ii) roll over the assets to the new employer's plan, if one is available and rollovers are permitted, (iii) roll over to an Individual Retirement Account ("IRA"), or (iv) cash out the account value (which could, depending upon the client's age, result in adverse tax consequences). If SFP recommends that a client roll over their retirement plan assets into an account to be managed by SFP, such a recommendation creates a conflict of interest if SFP will earn new (or increase its current) compensation as a result of the rollover. As SFP typically manages retirement plan assets as part of clients' total investment portfolios, SFP's compensation would typically not increase as a result of a retirement plan rollover and therefore a conflict of interest would not be present (with possible exceptions, including rolling over a pension balance into an IRA, in which case SFP's compensation would increase). **No client is under any obligation to roll over retirement plan assets to an account managed by SFP. SFP's Chief Compliance Officer, Bryan Lee, remains available to address any questions that a client or prospective client may have regarding the potential for conflict of interest presented by such rollover recommendation.**

Custodian Charges-Additional Fees. As discussed below at Item 12 below, when requested to recommend a broker-dealer/custodian for client accounts, SFP generally recommends that *Schwab* serve as the broker-dealer/custodian for client investment management assets. Broker-dealers such as *Schwab* charge brokerage commissions, transaction, and/or other type fees for effecting certain types of securities transactions (i.e., including transaction fees for certain mutual funds, and mark-ups and mark-downs charged for fixed income transactions, etc.). The types of securities for which transaction fees, commissions, and/or other type fees (as well as the amount of those fees) shall differ depending upon the broker-dealer/custodian (while certain custodians, including *Schwab*, do not currently charge fees on individual equity transactions, others do). SFP does not receive any portion of these fees/charges. **ANY QUESTIONS: SFP's Chief Compliance Officer, Bryan Lee, remains available to address any questions that a client or prospective client may have regarding the above.**

Portfolio Activity. SFP has a fiduciary duty to provide services consistent with the client's best interest. SFP will review client portfolios on an ongoing basis to determine if any changes are necessary based upon various factors, including, but not limited to, investment performance, market conditions, fund manager tenure, style drift, account additions/withdrawals, and/or a change in the client's investment objective. Based upon these factors, there may be extended periods of time when SFP determines that changes to a client's portfolio are neither necessary, nor prudent. Clients remain subject to the fees described in Item 5 below during periods of account inactivity.

Please Note-Use of Mutual and Exchange Traded Funds: SFP utilizes mutual funds and exchange-traded funds for its client portfolios. In addition to SFP's investment advisory fee

described below, and transaction and/or custodial fees discussed below, clients will also incur, relative to all mutual fund and exchange-traded fund purchases, charges imposed at the fund level (e.g. management fees and other fund expenses).

Client Obligations. In performing our services, SFP shall not be required to verify any information received from the client or from the client's other professionals, and is expressly authorized to rely thereon. Moreover, it remains each client's responsibility to promptly notify SFP if there is ever any change in his/her/its financial situation or investment objectives for the purpose of reviewing/evaluating/revising our previous recommendations and/or services.

Please Note: Investment Risk. Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by SFP) will be profitable or equal any specific performance level(s).

Item 5: Fees and Compensation

The current fee for a financial plan varies based on the amount of time predicted to be spent developing the plan. One-half of the quoted fee is payable at the commencement of the work. In some cases, on-going advisory services may be appropriate. The fee for such services will be established in writing by Client and SFP by executing a *Financial Planning & Investment Advisory Agreement*.

In unique circumstances and at SFP's discretion, the Firm may engage in hourly financial planning work. SFP's current billing rate is \$175-\$300 per hour.

On-Going Wealth Management Fees are as follows:

<u>Portfolio Value Range</u>	<u>Annual Fee as % of Value</u>
First \$2 million (\$0 - \$2m)	1.00
Next \$3 million (>\$2m - \$5m)	0.75
Next \$5 million (>\$5m - \$10m)	0.50
Over \$10 million (>\$10m)	0.25

The above fee schedule is a guideline for the typical Client strategy. SFP reserves the right to negotiate fees, *higher or lower*, depending on unique circumstances. The above fees apply to most client situations, but there may be exceptions. Minimum fees are determined by services provided.

Fees are based on the client's balance at the end of the calendar quarter and billed quarterly. Fees are debited, in arrears, directly from Client's investment account for the prior quarter's services unless other arrangements are made prior to the engagement. The advisory fee is a blended fee and is calculated by assessing the percentage rates using the predefined levels of assets as shown in the above chart, resulting in a combined weighted fee. For example, an account valued at \$2,500,000 would pay an effective fee of 0.95% with an annual fee of \$23,750. The quarterly fee is determined by the following calculation: $((\$2,000,000 \times 1.00\%) + (\$500,000 \times 0.75\%)) \div 4 = \$5,937.50$. A minimum quarterly fee applies and is determined based on the complexity of each client's circumstances. In certain instances, due to this minimum fee, a client may be charged a fee that is greater than the industry norm, and that client may pay lower fees for comparable services from other sources.

Certain investments recommended for ownership in Client portfolios will have their own internal operating expenses, which are a cost to the Client that comes out of the investment's total return. Such an example would be the annual expense ratio of a mutual fund/exchange-traded fund product. SFP receives no economic benefit from such expenses and seeks investment products that strive to keep such expenses low relative to other similar investments.

The custodian of Client assets will, in most cases, charge fees and/or commissions for their services. SFP may negotiate with custodians to keep custodian and trading costs at a minimum.

All investment management services and administration services will be provided on a fully disclosed basis. Prior to any engagement, Client will receive, in writing, a schedule of all charges to be assessed to the company sponsoring the plan and/or plan assets. Since the number of possible administration firms and investment managers is numerous, any specific reference to their charges has been omitted.

Generally, administration firms provide the record-keeping and IRS conformity testing for the plan and charge a flat annual fee plus a per-participant charge. Investment managers will typically charge an annual fee for assets under management depending on the size of the plan and the number of investment options used. SFP may charge a one-time plan initiation fee, which may vary according to complexity, to assist Client in establishing the plan investment strategy.

Grandfathering of Minimum Account Requirements: Pre-existing advisory Clients may be subject to SFP's minimum account requirements and advisory fees that were in effect at the time the Client entered into the advisory relationship. Therefore, our firm's minimum account requirements may differ among Clients.

Fee Dispersion. SFP, in its discretion, may charge a lesser investment advisory fee, charge a flat fee, waive its fee entirely, or charge fee on a different interval, based upon certain criteria (i.e. anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, complexity of the engagement, anticipated services to be rendered, grandfathered fee

schedules, employees and family members, courtesy accounts, competition, negotiations with client, etc.). **Please Note**: As a result of the above, similarly situated clients could pay different fees. In addition, similar advisory services may be available from other investment advisers for similar or lower fees. **ANY QUESTIONS**: SFP's Chief Compliance Officer, Bryan Lee, remains available to address any questions that a client or prospective client may have regarding advisory fees.

Margin Accounts: Risks/Conflict of Interest. SFP **does not** recommend the use of margin for investment purposes. A *margin account* is a brokerage account that allows investors to borrow money to buy securities. The broker/custodian charges the investor interest for the right to borrow money and uses the securities as collateral. By using borrowed funds, the customer is employing leverage that will magnify both account gains and losses. Should a client determine to use margin, SFP will include the entire market value of the margined assets when computing its advisory fee. Accordingly, SFP's fee shall be based upon a higher margined account value, resulting in SFP earning a correspondingly higher advisory fee. As a result, the potential of conflict of interest arises since SFP may have an economic disincentive to recommend that the client terminate the use of margin. **Please Note**: The use of margin can cause significant adverse financial consequences in the event of a market correction. **ANY QUESTIONS: Our Chief Compliance Officer, Bryan Lee, remains available to address any questions that a client or prospective client may have regarding the use of margin.**

Additional Fees and Expenses: In addition to the advisory fees paid to SFP, Clients bear certain charges that are imposed by other third parties, such as broker-dealers, custodians, trust companies, banks and other financial institutions (collectively "Financial Institutions"). These additional charges include securities brokerage commissions, transaction fees, custodial fees, fees charged by the Independent Managers, charges imposed directly by a mutual fund or ETF in a client's account, as disclosed in the fund's prospectus (e.g., fund management fees and other fund expenses), margin costs, reporting charges, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees and other fees and taxes on brokerage accounts and securities transactions. The Firm's brokerage practices are described at length in Item 12, below.

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

SFP is not a party to any performance or incentive-related compensation arrangements with its clients.

Item 7: Types of Clients

Individuals, high net worth individuals, pension plans, profit-sharing plans, charitable organizations, corporations and other business entities.

SFP imposes no minimum account size; however, it does require a minimum fee based on the complexity of each client's circumstances.

Fee Dispersion. As indicated above, SFP, in its discretion, may charge a lesser investment advisory fee, charge a flat fee, waive its fee entirely, or charge fee on a different interval, based upon certain criteria (i.e. anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, complexity of the engagement, anticipated services to be rendered, grandfathered fee schedules, employees and family members, courtesy accounts, competition, negotiations with client, etc.). In addition, based upon the scope and compensation of the services to be provided, SFP could impose a minimum fee for ongoing wealth management services. **Please Note:** In the event that the client is subject to an annual minimum fee, the client could pay a higher percentage fee than referenced in the above fee schedule. **Please Also Note:** As a result of the above, similarly situated clients could pay different fees. In addition, similar advisory services may be available from other investment advisers for similar or lower fees. **ANY QUESTIONS:** SFP's Chief Compliance Officer, Bryan Lee, remains available to address any questions that a client or prospective client may have regarding advisory fees.

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

The firm uses fundamental analysis.

In situations where SFP recommends the establishment of company-sponsored retirement plans, SFP will evaluate both short-term and long-term needs. After such assessment, SFP will propose the use of a plan administration firm and may recommend one or more investment managers for plan assets. SFP may recommend the use of its own proprietary management services.

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

Item 9: Disciplinary Information

SFP does not have any legal, financial, or other "disciplinary" item(s) to report.

Item 10: Other Financial Industry Activities and Affiliations

SFP may set up arrangements with other registered investment advisers whereby SFP manages portfolios, or portions of portfolios, for the clients of these other advisers and representatives. Additionally, in some circumstances, SFP may sub-contract other advisors and/or management firms for their financial planning, administrative or portfolio management services on a third-party basis.

As indicated at Item 4 above, SFP does not serve as an attorney, accountant, or insurance agent, and no portion of our services should be construed as same. Accordingly, SFP does not prepare legal documents, prepare tax returns, or sell insurance products. To the extent requested by a client, we may recommend the services of other professionals for non-investment implementation purpose (i.e. attorneys, accountants, insurance, etc.), including Complete Health & Wellness, a separate business owned by SFP President, Bryan Lee, for functional medicine, chiropractic, and other wellness services. The client is under no obligation to engage the services of any such recommended professional, including Complete Health & Wellness. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from SFP and/or its representatives. **Please Note-Conflict of Interest:** The recommendation by an SFP representative that a client utilize Complete Health & Wellness presents a ***conflict of interest***. No client is under any obligation to engage Complete Health & Wellness. Clients are reminded that they may obtain similar services from unaffiliated providers.

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

The firm has implemented an investment policy relative to personal securities transactions. This investment policy is part of the firm's overall Code of Ethics that serves to establish a standard of business conduct for all of the firm's associated persons, which is based upon fundamental principles of openness, integrity, honesty, and trust, a copy of which is available to clients and prospective clients upon request.

From time to time, the Firm may deal for its own account. Whenever the Firm and a client transact business in the same product and at the same point in time, if the two transactions are made at different terms, the Firm will ensure that the client receives the more favorable financial result and will accept for its own account the less favorable financial result.

The firm's Code of Ethics is monitored and reviewed on a regular basis by the firm's chief compliance officer or designated representative. All of the firm's associated persons must acknowledge the terms of the Code of Ethics annually, or as amended. Issues and procedural mandates concerning personal securities transactions and other ethical issues are memorialized in the firm's Code of Ethics. The advisor considers it a vital aspect of his client relations to

diligently provide his services in an ethically exemplary and accountable manner at the core of which is the spot to place clients' interests before his own. A copy of the firm's Code of Ethics will be provided to any client or prospective client upon request in accordance with SEC Rule 204A-1.

Item 12: Brokerage Practices

In the event that the client requests that SFP recommend a broker-dealer/custodian for execution and/or custodial services, SFP generally recommends that investment advisory accounts be maintained at Charles Schwab & Co., Inc. ("Schwab"). Prior to engaging SFP to provide investment management services, the client will be required to enter into a formal *Financial Planning & Investment Advisory Agreement* with SFP setting forth the terms and conditions under which SFP shall advise on the client's assets, and a separate custodial/clearing agreement with each designated broker-dealer/custodian.

Factors that SFP considers in recommending Schwab (or any other broker-dealer/custodian to clients) include historical relationship with SFP, financial strength, reputation, execution capabilities, pricing, research, and service. Broker-dealers such as Schwab can charge transaction fees for effecting certain securities transactions (*See* Item 4 above). To the extent that a transaction fee will be payable by the client to Schwab, the transaction fee shall be in addition to SFP's investment advisory fee referenced in Item 5 above.

To the extent that a transaction fee is payable, SFP shall have a duty to obtain best execution for such transaction. However, that does not mean that the client will not pay a transaction fee that is higher than another qualified broker-dealer might charge to effect the same transaction where SFP determines, in good faith, that the transaction fee is reasonable. 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, transaction rates, and responsiveness. Accordingly, although SFP will seek competitive rates, it may not necessarily obtain the lowest possible rates for client account transactions.

Research and Benefits: Although not a material consideration when determining whether to recommend that a client utilize the services of a particular broker-dealer/custodian, SFP can receive from Schwab (or another broker-dealer/custodian, investment manager, platform sponsor, mutual fund sponsor, or vendor) without cost (and/or at a discount) support services and/or products, certain of which assist SFP to better monitor and service client accounts maintained at such institutions. Included within the support services that can be obtained by SFP can be 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, discounted or gratis consulting services, discounted and/or gratis attendance at conferences, meetings, and other educational and/or social events, marketing support-

including client events, computer hardware and/or software and/or other products used by SFP in furtherance of its investment advisory business operations.

SFP's clients do not pay more for investment transactions effected and/or assets maintained at Schwab as the result of this arrangement. There is no corresponding commitment made by SFP to Schwab, or any other any entity, to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as result of the above arrangement.

ANY QUESTIONS: SFP's Chief Compliance Officer, Bryan Lee, remains available to address any questions that a client or prospective client may have regarding the above arrangements and the corresponding conflict of interest presented by such arrangements.

Directed Brokerage. SFP recommends that its clients utilize the brokerage and custodial services provided by Schwab. The Firm generally does not accept directed brokerage arrangements (but could make exceptions). A directed brokerage arrangement arises when a client requires that account transactions be effected through a specific broker-dealer/custodian, other than one generally recommended by the SFP (i.e., Schwab). In such client directed arrangements, the client will negotiate terms and arrangements for their account with that broker-dealer, and Firm will not seek better execution services or prices from other broker-dealers or be able to "batch" the client's transactions for execution through other broker-dealers with orders for other accounts managed by SFP. As a result, a client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case. **Please Note:** In the event that the client directs SFP to effect securities transactions for the client's accounts through a specific broker-dealer, the client correspondingly acknowledges that such direction may cause the accounts to incur higher commissions or transaction costs than the accounts would otherwise incur had the client determined to effect account transactions through alternative clearing arrangements that may be available through SFP. **Please Also Note:** Higher transaction costs adversely impact account performance. **Please Further Note:** Transactions for directed accounts will generally be executed following the execution of portfolio transactions for non-directed accounts.

Order Aggregation. Transactions for each client account generally will be effected independently, unless Firm decides to purchase or sell the same securities for several clients at approximately the same time. The Firm may (but is not obligated to) combine or "batch" such orders for individual equity transactions (including ETFs) with the intention to obtain better price execution, to negotiate more favorable commission rates, or to allocate more equitably among the Firm's clients differences in prices and commissions or other transaction costs that might have occurred had such orders been placed independently. Under this procedure, transactions will be averaged as to price and will be allocated among clients in proportion to the purchase and sale orders placed for each client account on any given day. In the event that the Firm becomes aware that a Firm employee seeks to trade in the same security on the same day, the employee transaction will either be included in the "batch" transaction or transacted after all discretionary client transactions have been completed. The Firm shall not receive any additional compensation or remuneration as the result of such aggregation.

Item 13: Review of Accounts

Portfolio account data is maintained on Custodian's computerized database system which tracks all values and transactions on a daily basis. Portfolios are regularly reviewed (at least quarterly) by the firm's financial planners. These reviews are intended to monitor asset allocation, volatility, cash levels, and performance of holdings. In general, Advisor uses a diversified, asset allocation approach to managing client assets, based primarily on the client's goals and objectives, risk tolerance, and time horizon.

Statements which detail the current value of holdings, portfolio composition, aggregate account value, and other information pertinent to the investment decision-making process are generally provided by custodian monthly, but no less frequently than quarterly. Clients are encouraged to review these statements upon receipt. Such reports will be sent or made available to client no later than 15 days after the end of the calendar month directly from their custodian. Accounts with no activity during a given month may not receive monthly statements, at the discretion of the custodian. SFP urges you to carefully review such statements. Special communications are directed to clients from time-to-time.

Item 14: Client Referrals and Other Compensation

SFP does not receive any economic benefit, directly or indirectly, from any third party for advice rendered to our clients, nor do we compensate any person for Client Referrals.

As indicated at Item 12 above, SFP can receive from Schwab (and others) without cost (and/or at a discount), support services and/or products. SFP's clients do not pay more for investment transactions effected and/or assets maintained at Schwab (or any other institution) as result of this arrangement. There is no corresponding commitment made by SFP to Schwab, or to any other entity, to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as the result of the above arrangement. **ANY QUESTIONS: SFP's Chief Compliance Officer, Bryan Lee, remains available to address any questions that a client or prospective client may have regarding the above arrangement and the corresponding conflict of interest presented by such arrangement.**

SFP does not maintain solicitor arrangements/pay referral fee compensation to non-employees for new client introductions.

Item 15: Custody

For the service provided in opening accounts, transacting trades, wiring funds, and/or other administrative functions, the custodian may charge certain fees.

SFP shall have the ability to deduct its advisory fee from the client's custodial account. Clients are provided with written transaction confirmation notices, and a written summary account statement directly from the custodian (i.e., Schwab, etc.) at least quarterly. **Please Note:** To the extent that SFP provides clients with periodic account statements or reports, the client is urged to compare any statement or report provided by SFP with the account statements received from the account custodian. **Please Also Note:** The account custodian does not verify the accuracy of SFP's advisory fee calculation.

In addition, certain clients have established asset transfer authorizations that permit the qualified custodian to rely upon instructions from SFP to transfer client funds or securities to third parties. These arrangements are disclosed at Item 9 of Part 1 of Form ADV. However, in accordance with the guidance provided in the SEC's February 21, 2017 *Investment Adviser Association* No-Action Letter, the affected accounts are not subject to an annual surprise CPA examination. Other services and/or practices (i.e., password possession and asset transfer authorizations) that are disclosed at Item 9 of Part 1 of Form ADV are subject to an annual surprise CPA examination. **ANY QUESTIONS: SFP's Chief Compliance Officer, Bryan Lee, remains available to address any questions that a client or prospective client may have regarding custody-related issues.**

Item 16: Investment Discretion

The client can determine to engage SFP to provide investment advisory services on a discretionary basis. Prior to engaging SFP to provide investment management services, the client will be required to enter into a formal *Financial Planning & Investment Advisory Agreement* with SFP setting forth the terms and conditions under which SFP shall manage the client's assets, and a separate custodial/clearing agreement with each designated broker-dealer/custodian.

Clients who engage SFP on a discretionary basis may, at any time, impose restrictions, **in writing**, on SFP's discretionary authority. (i.e., limit the types/amounts of particular securities purchased for their account, exclude the ability to purchase securities with an inverse relationship to the market, limit or proscribe SFP's use of margin, etc.).

Item 17: Voting Client Securities

SFP does not vote client proxies. Clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities 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. Clients will receive their proxies or other solicitations directly from their custodian. Clients may contact SFP to discuss any questions they may have with a particular solicitation.

Item 18: Financial Information

- A. SFP does not require clients pay fees more than six months in advance.
- B. SFP is unaware of any financial condition that is reasonably likely to impair its ability to meet its contractual commitments relating to its discretionary authority over certain client accounts.
- C. SFP has not been the subject of a bankruptcy petition.

Privacy Notice To Customers

SFP does not disclose nonpublic personal information about our individual clients or former clients except as permitted by law. SFP restricts access to nonpublic personal information about you (that we may obtain from your account and your transactions) to those employees who need to know that information to provide products or services to you or to alert you to new, enhanced or improved products or services we provide. SFP maintains physical, electronic and procedural safeguards that comply with federal standards to safeguard your nonpublic personal information.

ANY QUESTIONS: SFP's Chief Compliance Officer, Bryan Lee, remains available to address any questions regarding this Part 2A.