



Efficient Goal-Based Solutions

Disclosure Brochure

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March 3, 2022

This Disclosure Brochure provides information about the qualifications and business practices of PlanRock Wealth Management, LLC. If you have any questions about the contents of this Disclosure Brochure, please contact PlanRock Wealth Management, LLC at 800-677-6025 or support@PlanRock.com. The information in this Disclosure Brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any State Securities Authority.

Additional information about PlanRock Wealth Management, LLC also is available at the SEC's website www.adviserinfo.sec.gov (click on the link, select investment adviser firm" and type in our firm name). Results will provide you both Part 1 and 2 of our Form ADV.

PlanRock Wealth Management, LLC is a SEC registered investment adviser. PlanRock Wealth Management, LLC's registration as an investment adviser does not imply any level of skill or training. The oral and written communications provided to you, including this Disclosure Brochure, is information you use to evaluate PlanRock (and other advisers) which are factors in your decision to hire PlanRock Wealth Management, LLC or to continue to maintain a mutually beneficial relationship.

Material Changes

This is PlanRock Wealth Management, LLC's annual update filing of the Form ADV Part 2. This Brochure, dated March 3, 2022, is the amended filing of Form ADV Part 2 for PlanRock Wealth Management, LLC.

The amendment in this Brochure includes the following:

- There is a firm name change from PlanRock Investments LLC to PlanRock Wealth Management, LLC.
- Enhanced the details of PlanRock five (5) levels of engagement the Client is able to choose between: Bronze, Silver, Gold, Platinum and Platinum Concierge.

We may, at any time, update this Disclosure Brochure and either send you a copy or offer to send you a copy at no cost to you (either by electronic means (email) or in hard copy form).

How to Obtain a Current Brochure

If you would like another copy of this Disclosure Brochure, please download it from the SEC Website as indicated above or you may contact Client Support at 800-677-6025 or support@PlanRock.com.

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Advisory Business

PlanRock Wealth Management, LLC ("PlanRock" and sometimes referred to herein as "us" or "we" or "our" as appropriate) is an investment adviser registered with the SEC. We were established in 2019. Stephen Hammers is the Chairman and sole owner.

All services provided by PlanRock, and described within this document, are via the PlanRock website using technology and software.

We render investment advisory services for institutional and certain individual clients ("client" and sometimes referred to herein as "investor" or "you" or "your") for taxable and tax-exempt accounts; we provide fee-based advisory services to affluent to high-net-worth wealth clients comprised primarily of families, business owners, and professionals (the "Advisory Clients").

We do not offer tax or legal advisory services. You should seek outside counsel for these services.

As of March 3, 2022, we managed Client assets of approximately \$25 million in assets on a discretionary basis.

Our General Services:

Financial Planning – We offer comprehensive financial planning tools online for our clients. These online tools include of retirement, college, estate, tax as it relates to investments, and more. The tools are called "PlanRock Comprehensive Planning Tools".

Investment Management – PlanRock offers discretionary investment management services to clients through Fee- Based Accounts. We offer our investment management services through the access to "Separately Managed Accounts," a separately managed portfolio strategy. There are five (5) levels of engagement the Client is able to choose between: Bronze, Silver, Gold, Platinum and Platinum Concierge. The Client contracts with PlanRock to act as their investment advisor to perform the level of service(s) requested.

PlanRock's management of accounts and the level of transactions in Clients' accounts are in accordance with the written investment guidelines contained in the contracted Investment Policy Statement, Schedule A. We invest in various securities, including but not limited to, ETFs, mutual funds, common stock, corporate, municipal, U.S. Treasury bonds/notes, mortgage-backed securities, and other vehicles as appropriate, provided that such investments are consistent with the investment objectives of the Client. PlanRock will not recommend or hold single stocks that are not part of a diversified fee based professional portfolio manager account. We may use cash as an asset class, thus Clients may have a portion of their account held in cash for various periods of time.

PlanRock monitors Clients' accounts on an ongoing basis. We conduct periodic account reviews with Clients, depending on the Client's contracted level of service. PlanRock and the associated investment advisor will attempt to contact Client to review their goals and objectives at least annually. As authorized by Client, reviews may be between Client's outside advisor, which includes their accountants, attorneys, other advisors, and other consultants/professionals as deemed necessary by PlanRock to provide its services to Client and/or as requested by Client.

PlanRock is only responsible for the assets over which Client has provided PlanRock discretionary authority and not for the non-diversification/diversification, or any outside noncontractual investment, or any other assets of Client.

We act as a fiduciary regarding Clients under discretionary advisory services agreement, which means PlanRock, its advisors, and the associated investment advisors must put Clients interests above its own in managing Clients' accounts. PlanRock agrees to provide these services to Client in a manner consistent with its fiduciary duty to Client and the provisions of all applicable laws, including the Investment Advisers Act of 1940 (the "Advisers Act").

In some cases, we do not exercise investment discretion and instead provide investment recommendations. If we do not exercise investment discretion, either you or a third party designated by you have full responsibility for investment decisions. If a client has special needs and/or restrictions that require a portion of the portfolio to be held outside of our Model Portfolios, a separate non-discretionary account will be opened to house those funds. Such funds will be managed in line with the special needs and/or restrictions applicable to the account, the account will incur an advisory fee.

Investment Consulting (Sub-Advisory) – We offer online investment management advice to unaffiliated investment providers. Our services are directly to the investment company; which is indirectly to the individuals participating in the investment pools. The advice we provide is tailored to the pooled vehicles, not to the individual investors in the pools. Such relationships will be by the contractual relationship to determine the level of service offered. The pooled vehicles are developed by risk tolerance and follow their investment objectives which is outlined in the pool’s offering and governing documents. The advisory services we offer are comprised of investment vehicles such as mutual funds, exchange traded funds (“ETFs”), bonds, and other vehicles as appropriate.

Types of Accounts

Fee Based Accounts: For our Fee-Based Accounts, each Client investment portfolio will be based on the predetermined need of the investor via the online portal through our “Investment Policy Questionnaire”. Our aim is to meet the below objectives, risk tolerances and regions.

Objectives

- High Dividend
- Low Volatility
- Broad Market
- Broad Market Aggressive (called Tactical)
- Value Based (Faith Based)
- ESG (Environmental, Social and Governance)
- Income Only
- Alternative
- Balanced Tactical

Risk Tolerance

- Conservative
- Conservative to Moderate
- Moderate
- Moderate to Aggressive
- Aggressive

Region

- Domestic
- Global

We do not provide securities execution, custodial or other administrative services in connection with our Fee-Based Accounts. Instead, these services are provided by a third-party custodian. To establish a Fee-Based Account relationship, you must designate a third-party custodian acceptable to us and open an account with that third-party custodian.

Third Party Separately Managed Accounts. We also offer clients Separately Managed Accounts. If you participate in a separately managed account program through an advisor, we can assist you in constructing a portfolio

comprised of a combination of equity and/or fixed-income securities, equity exchange-traded funds, and money market mutual funds (or other short-term investment vehicles) that is designed to assist you in pursuing your identified financial goals and is consistent with your objectives and risk tolerance.

Platform for Independent Financial Advisors. PlanRock offers an all-inclusive platform for financial advisors. Advisors can focus on and grow their relationships. A few of the services we provide is listed below.

- Comprehensive Financial Planning
- Account Administrative and Support
- Compliance
- Billing
- Investment Models
- Marketing and Client Growth
- Performance Reporting
- Advice Flexibility

MANAGED SERVICE PACKAGES

PlanRock Comprehensive Planning Tools

PlanRock offers comprehensive planning tools as a stand-alone service for clients that do not request any of the services levels below. The stand-alone service is available at \$99 per quarter. The PlanRock Comprehensive Planning Tools is included for all clients that request investment management services through any of the services below. All service is available through the online portal.

The Comprehensive Planning Tools services include:

- Net Worth and Estate Planning
- Account aggregation (Any financial Institution)
- Account performance
- Retirement planning
- College planning
- Account holdings and asset allocation
- Liability management
- Other goal planning

Investment Management

PlanRock offers over 40 customized and fully researched investment portfolios to meet individual needs.

Advisor Access Service

- Investment Portfolio Management by the PlanRock professional investment staff.
- Personalized Investment Policy Statement based on your customized goals and objectives.
- Comprehensive Financial Planning Tools.
- Education and articles.
- Personalized account administrative and support services to your financial advisor.
- A quarterly basic performance report sent to your online portal vault reviewing your PlanRock 'investment portfolio held at Charles Schwab Institutional.
- Ongoing advice is not available with this service. Only through your independent (of PlanRock) financial advisor
- The annual fee for this level, which includes all the services listed above, is 0.55%. *Minimum annual fee: \$550

- This service can only be accessed through an independent financial advisor not affiliated with PlanRock

Bronze Level Service

- Investment Portfolio Management by the PlanRock professional investment staff.
- Personalized Investment Policy Statement based on your customized goals and objectives.
- Comprehensive Financial Planning Tools.
- Education and articles.
- Personalized account administrative and support services.
- A quarterly basic performance report sent to your online portal vault reviewing your PlanRock investment portfolio held at Charles Schwab Institutional.
- Annual review with a financial advisor through our online planning tools portal.
- Ongoing advice is not available with this service.
- The annual fee for this level, which includes all the services listed above, is 0.55%. *Minimum annual fee: \$550

Platinum

- Investment Portfolio Management by the PlanRock professional investment staff.
- Personalized Investment Policy Statement based on your customized goals and objectives.
- Comprehensive Financial Planning Tools.
- Personal guidance and construction with the PlanRock Financial Planning Tools.
- Education and articles.
- Personalized account administrative and support service.
- Quarterly comprehensive performance report, sent to your online portal vault, reviewing your PlanRock account held at Charles Schwab Institutional.
- Quarterly, personalized video from the Chief Investment Officer or your Financial Advisor, discussing the markets, economy, and your investment portfolio.
- Quarterly review with a financial advisor through our online planning tools portal or in person.
- The annual fee for this level, which includes all the services listed above, is 1.05%. *Minimum annual fee: \$1,050. Discounts may apply if services are denied or not offered.

Platinum Concierge

- Investment Portfolio Management by the PlanRock professional investment staff.
- Personalized Investment Policy Statement based on your customized goals and objectives.
- Comprehensive Financial Planning Tools.
- Personal guidance and construction with the PlanRock Financial Planning Tools.
- Education and articles.
- Personalized account administrative and support service.
- Quarterly comprehensive performance report, sent to your online portal vault, reviewing your PlanRock account held at Charles Schwab Institutional.
- Quarterly, personalized video from the Chief Investment Officer or your Financial Advisor, discussing the markets, economy, and your investment portfolio.
- Quarterly review with a financial advisor through our online planning tools portal or in person.
- Full-service concierge services such as, comprehensive full-service planning, vacation planning, and bill payment to name a few.
- Unlimited guidance, service, and advisory needs.
- The annual fee for this level, which includes all the services listed above, is 1.35%. *Minimum annual fee: \$1,350. Discounts may apply if services are denied or not offered.

**Our minimum fees, based on our extensive services, maybe be closer to a \$100,000 household relationship.*

Fees and Compensation

We are compensated in different ways depending on the types of services we provide. In the case of investment management services, typically clients pay fees that are based on a percentage of the assets managed by us. In some cases, the percentage (asset based) fees are negotiable, but generally are based on our standard fee schedule below.

No portion of PlanRock's fee shall be based on a share of capital gains upon or capital appreciation of the assets or any portion of the assets in Client's account. All assets held in Client's account will be subject to this fee, including assets, such as cash, that are temporarily awaiting investment as well as securities that Client requests to be held outside of PlanRock's *Level of Services* portfolios. If margin is used in managing the account, the market value of the account and the corresponding fee payable to PlanRock will be increased.

On a regular basis our investment advisory services fees are paid monthly in advance based on the average daily value of all accounts in the household; multiply the annual fee times this value, times the percentage of days of the year in the current month. This amount is debited on or about the 15th day of the month following the end of the calendar month. However, if management of the account commences on a day other than the first business day of a calendar month fees are processed in the following manner.

If the inception of the deposit is within anytime in the first month, using the date of inception, the number of days remaining in the month is calculated. The annual fee rate is then applied to the household value and the percentage of the month remaining. This amount is invoiced and debited on or near the date of inception.

PlanRock clients and/or household with multiple accounts are permitted to only have one level of service on the PlanRock's platform.

PlanRock may amend and/or increase the fees set forth in the Fee Schedule if PlanRock provides Client with written notice of the amendment 30 days in advance.

Client understands that services similar to those provided by PlanRock in this Agreement may be available from other sources at lower or higher costs.

The Client authorizes the Custodian carrying Client's account to charge their account the amount of PlanRock's fee and to remit such fee to PlanRock LLC in accordance with Client's instructions. PlanRock holds that the client is responsible for confirming the accuracy of the Custodian's fee calculation. If there is not enough liquid cash or equivalents in the account to pay the fee when due, Client authorizes PlanRock to instruct the Custodian to liquidate the necessary positions in the account to cover the amount of the fees due to PlanRock under the Agreement.

Fees:

Level of Service	Asset management, administrative, support and planning Fee (in basis points)	Minimum Annual Fees Apply
Planning Tools Only	\$99 Per Quarter	\$396
Advisor Access	0.35% (35 bps)	\$450
Bronze	0.55% (55 bps)	\$550
Platinum	1.05% (105 bps)	\$1,050
Family Office	1.35% (105 bps)	\$1,350

Level of Service – Advisor Directed	Asset management, administrative, support and planning Fee (in basis points)	Minimum Fees for Household
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Platinum	0.90% (90bps)	\$900
Family Office	1.20% (120bps)	\$1200

Fee discounts may be available based on asset level and level of services desired by the client. Excludes Bronze service. Percentage Discount by 10% increments if applicable: _____
Excludes Bronze service.

Other Fees and Charges.

* There will be \$50 technology fee per account beginning with the second account.

In addition to the investment management fees paid to us, Advisory Client will be responsible for all expenses related to their operation, including all costs and expenses of maintaining the operations of the Fund and its investments paid by or on behalf of the Fund, including, without limitation:

- *Mutual Fund and Similar Commissions and Expenses.* Typically, accounts will incur a commission in connection with the purchase or sale of an ETF and such commission will be paid from the assets of the Client's account. Also, all mutual funds, ETFs and similar funds purchased (including money market mutual funds used for investment of cash balances) will have ongoing expenses. These ongoing expenses may include management fees, distribution expenses, 12(b)(1), shareholder servicing, administrative service and similar fees. Fund charges and expenses are subject to change. In some cases, the investment of assets in mutual funds, ETFs and other funds will result in the receipt of additional compensation by us.
- *Brokerage and Custodian Fees and Charges.* Pooled investments (Funds) will incur fees, commissions, charges and expenses of the custodian or clearing broker and any introducing broker. These fees, commissions, charges and expenses are established by the fund's custodian, clearing broker or introducing broker, as applicable, and are subject to change. In addition, the Client will incur all applicable brokerage commissions, transaction charges, exchange fees, SEC fees, wire transfer charges, transfer taxes, electronic fund processing fees and other expenses associated with the transactions within their account.

Performance Based Fees and Side-By-Side Management

We do not charge advisory fees on a share of the capital appreciation of the funds or securities in a client account (so-called performance-based fees). Advisory fee compensation is charged only as disclosed above (in Item 5).

Types of Clients

We provide services to, among others:

- Individuals, including affluent and high net worth individuals
- Trusts, estates and charitable organizations
- Corporations or other business entities
- Registered investment companies (or Client Advisers) that are marketed to retail investors.
- Investment Advisors

In the case of investment management accounts, the minimum investment portfolio is \$100,000.

In some cases, we will permit a client to aggregate related accounts by household. Household is based on immediate family or same last name. To establish a Fee-Based Account or Separately Managed Account relationship, you must have a third-party custodian chosen by PlanRock. PlanRock utilizes the custodial services of Charles Schwab Institutional.

Analysis

Fee-Based Accounts. The Diversified Portfolios Team uses a strategic asset allocation, and ongoing monitoring with reallocation within the Model Portfolios.

The investment models are based on the following solution/objectives:

Solution:

1. Meet or beat the stock or bond market over time – The need for income from equities is not important.
2. Lower volatility than the stock market, while seeking growth of the portfolio over time.
3. The need for dividend income and regular cash flow is important.
4. Alternative investments – Need for low to negative correlation to the stock and bond markets.
5. Time frame of the specific account goal.

Monitoring and Reallocation. PlanRock monitors the behavior of the Funds comprising the Model Portfolios and considers implementation of changes in the Funds or the allocation among Funds as needed in order to restore the Model Portfolios to their long-term strategic asset allocation and desired risk parameters.

Our Investment Consulting services are determined mainly by the Clients' guidelines or governing documents. Generally, we utilize a variety of investment instruments in the implementation, including, but not limited to, equity, fixed income, mutual funds, ETFs, futures, and other funds. We seek volatility optimization, utilizing market technical and fundamental analyses to select investments.

Our strategies utilize a broad variety of instruments in its implementation, including, but not limited to, equity, fixed income, mutual funds, ETFs, commodity futures, currency, and other funds. There may be occasions when the strategy may be weighted to meet the results of the Clients guidelines or governing documents.

No guarantee or representation is made that the strategies will be successful, that the targeted return and risk will be achieved or maintained, or that the various investments made in the strategies will have low correlation with each other or with the financial markets in which the strategies invest.

Investing in securities of any kind involves risk of loss that Clients must be aware of and prepared to bear. An investment in any of our strategies involves a significant degree of risk. Therefore, it should be undertaken only by investors capable of evaluating the risks associated with an investment and bearing the risks such investment represents. Each Client must have enough knowledge and experience in financial and business matters to be capable of evaluating the merits and risks of such an investment. The offering and governing documents of each Client will contain detailed descriptions of certain of the risks associated with an investment in a Client. (See Item 4, Types of Clients)

Our investment approach takes into consideration the potential risk of loss and seeks to match the investment strategy employed for you with your tolerance for potential fluctuations in markets and incurring losses. Generally, you must invest in securities that have a higher risk of loss in order to obtain a higher potential for long-term gains. There is no guarantee that our investment strategies will meet your objectives or, in any event, protect your assets from the potential for losses. Depending on the types of securities you invest in, you may face the investment risks described below:

- Portfolios that invest in lower-rated debt securities (commonly referred to as junk bonds) involve additional risks because of the lower credit quality of the securities in the portfolio. As a result, investment in junk bonds may expose clients to a higher level of volatility and increased risk of default.
- International investing involves special risks including greater economic and political instability, as well as

currency fluctuation risks, which may be even greater in emerging markets.

- Investments in stocks of small companies involve additional risks. Smaller companies typically have a higher risk of failure and are not as well-established as larger blue-chip companies. Historically, smaller-company stocks have experienced a greater degree of market volatility than the overall market average.
- Investments in real estate have various risks including possible lack of liquidity and devaluation based on adverse economic and regulatory changes.
- The price of commodities, such as gold and currency, is subject to substantial price fluctuations of short periods of time and may be affected by unpredictable international monetary and political policies. The market for commodities is widely unregulated and concentrated investing may lead to higher price volatility.

The above list of risk factors does not assert to be a complete enumeration of the risks involved in an investment in any or all of our strategies. Prospective Clients should read this entire Form ADV and all accompanying materials we provide and consult with your own advisers before deciding whether to invest in the strategies. Further, as the strategies develop and change over time, an investment in the strategies may be subject to additional and different risk factors. We will amend this Brochure if, and when, any information regarding its investment risks and strategies becomes materially inaccurate. **Past performance is no guarantee of future results.**

Disciplinary Information

This section is not applicable to PlanRock. There are no current legal or disciplinary events for either the firm or the key executives.

Other Financial Industry Activities and Affiliations

Through our website we act as a sub-advisor or other controlling entity in private funds that invest in securities or other investments in which our Clients may be solicited or wish to invest. Please note that Item 12 discuss our allocation policies in more detail and discuss how we strive to minimize conflicts between our Clients separately managed accounts and funds.

We do not act in any capacity as a broker dealer.

Other PlanRock Business and Activities

As part of our regular business, we provide the above listed services (see Item 4). In the regular course of our advisory, sub-advising; we represent potential purchasers, sellers and other involved parties, including corporations, financial buyers, family offices, shareholders and institutions, with respect to transactions that could give rise to transactions that are suitable for a Client. In such a case, an advisory client would typically require us to act exclusively on its behalf, thereby precluding other Clients from participating in such transactions. PlanRock will be under no obligation to decline any such engagements in order to make an investment opportunity available to other Clients. In connection with our advisory, portfolio development, and other businesses, we come into possession of information that limits our ability to engage in potential transactions. The Clients' activities are expected to be constrained as a result of the inability of PlanRock personnel to use such information. Such cases will be limited to no more than fifteen (15) clients in a given twelve (12) month period.

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

PlanRock's Code of Ethics ("Code"), adopted pursuant to Rule 204A-1 under the Advisers Act, and confirms we are commitment to the highest ideals of honesty and integrity. We demonstrate this commitment through our measures taken to ensure the confidentiality of Client information, prohibition of illegal insider trading and market manipulation, the acceptance of gifts, provision of political donations, and the scrutiny applied to the personal investments and other outside activities of employees. All employees undergo Code of Ethics training annually in addition to certifying annually that they have read and understand the Code.

Code of Ethics

As required by law, we have adopted a Code of Ethics establishing policies and procedures to handle potential conflicts of interest that may arise from providing advisory services to you.

Our Code of Ethics recognizes that we are a fiduciary and is designed so that we meet our fiduciary obligation to you by setting forth standards of conduct for our directors, officers and employees and requiring compliance with federal securities laws.

Our Code of Ethics is based upon the principle that our employees owe a duty to you to conduct their affairs, including their personal securities transactions, in such a manner as to avoid 1) serving their own personal interests ahead of your interests, 2) taking inappropriate advantage of their position as an employee, and 3) any actual or potential conflicts of interest or any abuse of their position of trust and responsibility.

Our Code of Ethics:

- Requires that we maintain the confidentiality of your information;
- Prohibits:
 - Insider trading (if we are in possession of material, non-public information);
 - Rumor mongering;
 - The acceptance of gifts and entertainment that exceed our policy standards;
- Requires the reporting of gifts and business entertainment by certain of our employees;
- Requires that certain of our employees' report (on an on-going and quarterly basis) all of their personal securities transactions (what we call "reportable securities" as mandated by regulation); and,
- Requires that all of our officers, directors and employees re-certify to our Code of Ethics, identify members of their household and any account to which they have a beneficial ownership (that is, they "own" the account or have "authority" over the account), and identify securities held in certificate form and all securities.

Also, our Code of Ethics also provides that no director, officer or employee may trade securities, either personally or on behalf of others, while in possession of material, non-public information with respect to any such securities, or may communicate material, non-public information to others, other than as required and allowed by the Code of Ethics.

To receive a copy of our Code of Ethics, you should contact your account representative or call us at 800-677-6025.

Investment decisions are made across portfolios by a systematic investment process with parameters set according to specific portfolio targets and guidelines, not by individuals recommending particular investments to particular end clients. We perform ongoing audits to ensure there is consistency of the investment objective and guidelines for the portfolios. We have controls around access to the output of the investment process and only necessary employees have access to forward-looking trade information.

Our personal trading policy allows employees to purchase or sell similar securities to those purchased and sold for Client accounts. However, all employees are subject to restrictions and monitoring intended to allow reasonable long-term investing yet prevents short-term trading or the ability to trade in a way related to our Client's trading. Personal trading by employees is monitored by our Compliance Department.

Brokerage Practices

Our decisions to recommend, purchase, sell or hold securities are based on the specific investment objectives, guidelines, restrictions and circumstances of each portfolio. Our metrics are intended to ensure that our execution is in line with its fiduciary duty to clients and established standards for best execution.

Our authority over our client transactions is limited by our internal policies and procedures and each portfolio's investment guidelines. If we assist with selecting brokers and dealers to effect portfolio transactions, we seek to obtain best execution, taking into consideration our best execution policies and procedures as well as the fiduciary duties. We do not enter into any formal arrangements for the receipt of brokerage and research services from executing broker-dealers, although we consider the receipt of technology for proprietary research from a broker. Our best execution policies and procedures are based on several factors including, but not limited to, anonymity, minimal market impact, trade clearing and settlement capability in addition to trade execution commission charges. We realize that cheapest is not always best.

Trade Aggregation and Allocation Policy

We seek to execute trades in a way that minimizes transaction and booking costs and that is designed to ensure fair treatment for all accounts. Orders are often executed in blocks (i.e., there are multiple accounts grouped into single orders) to achieve execution efficiency, cost efficiency, anonymity and to minimize volatility in prices across accounts where possible. When we encounter investment opportunities that are appropriate for more than one Client or fund, or when an aggregated order is only partially filled, we will allocate the investment opportunity or a partially filled order on a fair and equitable basis, based upon the procedures for the portfolio being traded. Generally, PlanRock's fair and equitable approach is to target a proportional distribution of executions across accounts but use some random assignments to handle remainders and in cases where it is beneficial to limit the number of accounts per fill. The random account ordering is determined prior to the execution of each order.

Error Policy

In accordance with internal policies, "trade errors" as, a trade execution error by PlanRock's trader that requires reversal due to a deemed inconsistency with the portfolio's investment intent, where, for example, our trader sold a security that we intended to purchase. When such a trade execution error results in a loss to a Client's portfolio in excess of five thousand dollars (\$5,000), PlanRock will make adjustments in the account to restore the Client's portfolio to the position it would have been had the execution error not occurred and, where required by the terms of the applicable Client contract, provide notification as required by such contract.

We undertake to correct each trade error as soon as practicable upon its discovery. However, because the time required is dependent upon the nature of the error itself, no absolute timetable exists. Our compliance policy is to maintain a written record of all identified trade errors and the ultimate resolution of the trade errors in accordance with the books and records requirements of Rule 204-2 of the Advisers Act.

Directed Brokerage

PlanRock may limit itself to use custodians, futures clearers, brokers, clearinghouses, exchanges or other counterparties that meet certain criteria determined from time to time by us. Clients can request that a broker-dealer or select group of broker-dealers be used to effect transactions in their accounts or may request that certain broker-dealers be restricted from effecting such transactions. These limitations may result in Clients paying more for such services than would be the case if such decisions were based solely on price.

Review of Accounts

Investment strategies are reviewed on an ongoing basis to ensure that the performance and strategies are appropriate and suitable for the models' objectives. We will provide performance reports to clients through the clients' online portal in accordance with the client's managed service package.

Our investment professionals review portfolio model performance on an ongoing basis. Client performance is reviewed as well to ensure tracking with investment objectives. This analysis includes, but is not limited to, a review of:

- Compliance with the investment strategy and restrictions provided in the offering documents of Fund/Client
- Style Drift
- Performance Attribution
- Potential Conflicts
- Market Conditions

In addition, regular statements or reports should be provided by the Custodian or Brokerage firm that is responsible for handling the account. PlanRock will provide an investment commentary (based on the level of service provided) concerning the overall market and PlanRock's portfolios.

Client Referrals and Other Compensation

We allow for fee discount based on client referrals (see Item 5). PlanRock also may make cash payments to third parties for solicitation activities in accordance with Rule 206(4)-3 of the Advisers Act, to the extent applicable.

Custody

We do not maintain Custody of client funds or securities other than drafting Client accounts for fees. As such, this Item is not applicable.

Investment Discretion

Through our online investment management agreements with our Clients, we act as a limited discretionary investment adviser and may exercise sole authority in accordance with our trading systems, methods, models, strategies and formulas; to determine the securities bought and sold for each account, as well as the amounts thereof, without obtaining specific client consent and without limitation on such authority. PlanRock's authority over Client's investments includes discretionary authority to purchase and sell securities for Client's account in accordance with Client's objectives as Client has contracted with PlanRock, to submit aggregated trade orders for Client and others in order to obtain best execution, and to give instructions concerning these transactions to the custodian(s) with which Client's account(s) are held. Any specific investment guidelines, other related terms set forth in each such agreement, and restrictions are provided in the Fund documents or investment management agreement, as applicable. PlanRock will have no authority to withdraw or transfer assets from Client's account, except to a destination pre-set by the client and in accordance with Client's specific written instructions to PlanRock. Also see Section 1, *Advisory Business* above.

Voting Client Securities

PlanRock does not, vote client proxies. As such, this Item is not applicable.

Financial Information

To our knowledge, there is no financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients.

State Registered Advisor

We are a SEC registered advisor based on the SEC Rule 203A-2(a) exemption, as an online Internet investment advisor.

The firm's primary executive officer is Mr. Stephen Hammers. Full disclosure related to Mr. Hammers business background and education is supplied on the Part 2B Officers Brochure Supplement.