



## **BluePrint Wealth Management, LLC**

**3602 Kiessel Road  
The Villages, FL 32163**

**Telephone: (352) 674-3911**

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### **FORM ADV PART 2A BROCHURE**

This brochure provides information about the qualifications and business practices of BluePrint Wealth Management, LLC. If you have any questions about the contents of this brochure, contact us at (352) 674-3911. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about BluePrint Wealth Management, LLC is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Click on the "Investment Adviser Search" link and then search for "Investment Adviser Firm" using the firm's IARD ("CRD") number, which is 169997.

BluePrint Wealth Management, LLC is a registered investment adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

## Item 2 Summary of Material Changes

Form ADV Part 2 requires registered investment advisers to amend their brochure when information becomes materially inaccurate. If there are any material changes to an adviser's disclosure brochure, the adviser is required to notify you and provide you with a description of the material changes.

A material change has been made since the previous filing dated March 8, 2023, in Item 4 regarding the controlling interest of the firm. RSC Insurance Brokerage, Inc. now owns all the controlling interest. Additionally, we have made our Brownwood Paddock Square location our principal address. The address is located on the cover page of this Brochure.

Our firm may at any time update this document and either send a copy of its updated brochure or provide a summary of material changes to its brochure and an offer to send an electronic or hard copy form of the updated brochure. Clients are also able to download this brochure from the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) or may contact our firm at (352) 674-3911 to request a copy at any time.

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## Item 4 Advisory Business

### Description of Firm

BluePrint Wealth Management, LLC is a Florida domiciled limited liability company formed in December of 2013. Our original registration as an investment adviser occurred in May of 2014, with the State of Florida, and has since transitioned to an SEC registration during January of 2022. We operate under the trade name BluePrint Wealth Management. RSC Insurance Brokerage, Inc. is the principal owner of the firm.

The following paragraphs describe our services and fees. BluePrint Wealth Management has several financial services industry affiliates or related parties that are described in further detail under the *Other Financial Industry Activities and Affiliates* section of this brochure (see Item 10). Since our investment strategies and advice are based on each client's specific financial situation, the investment advice we provide to you may be different or conflicting with the advice we give to other clients regarding the same security or investment.

Refer to the description of each investment advisory service listed below for information on how we tailor our advisory services to your individual needs. As used in this brochure, the words "we," "our," "firm", and "us" refer to BluePrint Wealth Management and the words "you," "your," and "client" refer to you as either a client or prospective client of our firm.

### Description of Firm Services

BluePrint Wealth Management offers the following advisory services:

- Investment Management Services
- Financial Planning
- Pension and Profit-Sharing Plan Services
- Selection of Other Advisers

During or prior to our first meeting, we will provide you with certain disclosures and request information from you. An associate of our firm will hold one or more discussions with you and conduct an analysis to determine how best to tailor our investment services to your financial needs, goals, holdings, etc. Depending on the scope of the engagement, you may be asked to provide copies of the following documents early in the process:

- Statements reflecting current investments in retirement and non-retirement accounts;
- Stock options and stock purchase plan agreements;
- Information on current retirement plans and other benefits provided by an employer;
- Current financial specifics including W-2s, 1099s, K-1 statements, etc.;
- Wills, codicils, and trusts;
- Insurance policies, including information about riders, loans, and amendments;
- Mortgage information;
- Tax returns (current and prior years);
- Divorce decree or separation agreement; and
- Employment or other business agreements.

It is important that we are provided with an adequate level of information and supporting documentation throughout the term of the engagement, and that it is accurate. Our firm may, but is not obligated to, verify the information that has been provided to us which will then be used in the advisory process.

Our review will include a client's investment objectives, time horizon, liquidity needs, tolerance for risk and other factors necessary to form the basis for our investment recommendations to you (herein referred to as "investment parameters"). Clients will complete a statement of investment selection or other suitability forms ("Risk Profile Questionnaire" or "RPQ") to assist us with this process.

Clients are able to impose reasonable restrictions on investing in certain securities or types of securities unless otherwise stated in the advisory agreement. For example, you can specify that the investment in any particular stock or industry should not exceed specific percentages of the value of portfolios and/or restrictions or prohibitions of transactions in the securities of a specific industry or security. We will then work with you to develop a portfolio tailored to your unique situation and goals. Depending on your investment parameters, the portfolio will involve the employment of one or more suggested investment strategies as well as either a broad range or more narrowly focused choice of investment vehicles that are further discussed in the *Methods of Analysis, Investment Strategies and Risk of Loss* section of this brochure (see Item 8).

### **Investment Management Services**

Through our investment management services offering we develop a customized portfolio for the client where we serve as portfolio manager under a discretionary agreement, and the engagement includes:

- Determination of investment strategy;
- Investment guideline development;
- Asset allocation;
- Asset selection;
- Regular monitoring; and
- Periodic rebalancing.

As part of our investment management services, we may invest your assets according to one or more proprietary model portfolios. These models are designed for investors with varying degrees of risk tolerance and investment objectives ranging from strategies that focus on income, balanced, growth & income, growth and aggressive growth.

If you participate in our discretionary investment management services, we require you to grant our firm discretionary authority to manage your account. Discretionary authorization will allow us to determine the specific securities, and the amount of securities, to be purchased or sold for your account without your approval prior to each transaction. Discretionary authority is typically granted by the investment advisory agreement you sign with our firm and the appropriate trading authorization forms. You may limit our discretionary authority, as described above, by providing our firm with your restrictions and guidelines in writing. As part of our investment management services, we provide complimentary financial planning services. Financial planning services may include: cash flow analysis; investment planning; retirement planning; educational savings and planning; estate planning coordination; charitable giving; debt counseling; and insurance planning and risk management.

Furthermore, the firm's investment adviser representatives may also be licensed insurance agents and certified public accountants (CPAs) and offer insurance products and tax preparation services in their individual capacity or through one or more affiliated companies. These services are offered under a separate agreement and will not be within the scope of advisory services offered by Blueprint Wealth Management. Please see the *Other Financial Industry Activities and Affiliations* section (Item 10) for additional information.

### **Pension and Profit-Sharing Plans**

As part of our investment management services, our firm provides employee benefit plan services to employer plan sponsors, or named fiduciary, on an ongoing basis. Generally, such services consist of

assisting employer plan sponsors in establishing, monitoring and reviewing their company's participant-directed retirement plan. In limited circumstances, our firm acts as a named fiduciary for certain qualified retirement plans, such as self-employed 401k plans. Refer to the ERISA Rider in the advisory agreement for important disclosures and additional information. In providing employee benefit plan services, our firm does not provide any advisory services with respect to the following types of assets: employer securities, real estate (excluding real estate funds and publicly traded REITS), participant loans, non-publicly traded securities or assets, other illiquid investments, or brokerage window programs (collectively, "Excluded Assets").

#### Rollover Recommendations

If a client desires to conduct an account rollover from their employer-sponsored plan or we recommend the rollover, after an analysis of the client's situation and their retirement plan documents, we consider (but not limit) the following relevant factors:

- Are there alternatives to the employer plan rollover, including leaving the money in an employer's retirement plan (if permitted)?
- What are the fees and expenses associated with both the employer's plan and the rollover IRA?
- Does the employer currently pay for some or all the plan's administrative expenses?
- What are the different levels of services and investments available under the employer plan and the rollover IRA?
- What are the long-term impacts if there are increased costs?
- Is the rollover appropriate notwithstanding any additional costs?
- What is the impact of economically significant investment features such as surrender schedules and indexed annuity cap and participation rates (such as in an employer sponsored 403(b) plan account)?

For purposes of complying with the DOL's Prohibited Transaction Exemption 2020-02 ("PTE 2020-02") where applicable, we are providing the following acknowledgment to you. When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

We benefit financially from the rollover of your assets from a retirement account to an account that we manage or provide investment advice, because the assets increase our assets under management and, in turn, our advisory fees. As a fiduciary, we only recommend a rollover when we believe it is in your best interest.

### **Selection of Other Advisers**

We may select or recommend the services of a third-party investment manager (herein referred to as "third-party manager" or "TPM") to manage all, or a portion of, your investment portfolio. After gathering information about your financial situation and objectives, we may select or recommend that you engage a specific third-party manager or investment program. Factors that we take into consideration when making our recommendation(s) include, but are not limited to, the following: the TPM's performance, methods of analysis, fees, your financial needs, investment goals, risk tolerance, and investment objectives. We will monitor the TPM's performance to ensure its management and investment style remains aligned with your investment goals and objectives. Additionally, we retain discretionary authority to hire and fire TPM's without your prior approval.

Third-party managers will invest on behalf of a client account in accordance with the strategies set forth in their own disclosure documents which will be provided to the client by our firm prior to employing their strategies. The selected third-party manager typically assumes discretionary authority over an account and some of these programs are not available for those clients who prefer an account to be managed under a non-discretionary engagement or who have other unique account restrictions. Note that certain third-party managers require a higher asset-level to invest in their program. We will inform interested clients in advance of each TPM's minimum investment criteria.

At least annually thereafter, a review will be performed to determine whether the selected third-party manager remains an appropriate fit based on the client's investment parameters.

### **Sub-Adviser Relationships**

We have entered into a sub-advisory relationship with GeoWealth Management, LLC ("GeoWealth"), an unaffiliated SEC-registered investment adviser, to provide back office, billing, and trading support. We pay a portion of our advisory fee, called a platform fee, to GeoWealth; however, you will not pay our firm a higher advisory fee as a result of our sub-advisory relationship with GeoWealth. In certain instances, you will be required to sign an authorization form to grant GeoWealth the necessary access to perform these duties. Additionally, we may hire and fire any sub-adviser without your prior approval. See the *Other Financial Industry Activities and Affiliations* section (Item 10) for additional information.

We are responsible for the continuing supervision of the third-party managers or sub-advisers in connection with the services provided to your account or assets subject to their management.

### **Types of Investments**

We primarily offer advice on equity securities (stocks), exchange traded funds (ETFs), mutual funds, municipal and corporate bonds, and cash instruments. We also recommend fixed and indexed annuities and life and health insurance products through affiliated entities. Additionally, we will advise you on various types of investments based on your stated goals and objectives. We can also provide advice on any type of investment held in your portfolio at the inception of our advisory relationship.

### **Assets Under Management**

As of March 27, 2023, our firm had \$94,016,000 in discretionary assets under management and \$0 non-discretionary assets under management.

## **Item 5 Fees and Compensation**

### **Investment Management Services**

BluePrint Wealth Management charges its investment management services clients an advisory fee that is based on a percentage of the market value of the assets that we manage. We do not assess account opening or administrative "set-up" fees. If the advisory agreement is executed at any time

other than the first day of a calendar quarter, our fees will apply on a pro rata basis, which means that the advisory fee is payable in proportion to the number of days in the quarter for which you are a client. The initial advisory fee is billed in arrears, and thereafter, the quarterly asset-based fee is paid in advance.

Our asset-based fee is charged quarterly, in advance, based on the market value of the assets on the last calendar day of the previous quarter (see *Fee Calculation Methodology below*). Our maximum annualized asset-based fee is 1.25% or 125 basis points. Cash and money market balances are excluded from the advisory fee calculation except for cash or money market balances included in model portfolios. Deposit and withdrawals that occur during the billing quarter are pro-rated and applied to the next quarterly billing. Advisory fees may be amended from time to time upon 30-days prior written notice to you.

**Fee Calculation Methodology: (quarter-end market value x annual fee %) x (# of days in the quarter/ # of days in the year)**

For example, an account under our management with account assets valued at \$500,000 on the last day of the calendar quarter would be assessed an advisory fee of \$1,575.34, in advance, which covers the next quarter. Formula:  $(\$500,000 \times 1.25\%) \times (92/365) = \$1,575.34$

Terms of service, fees charged, etc., will be stated in the firm's advisory agreement with each client. Our published fees are negotiable based on a variety of factors, including, but not limited to the:

- size of the relationship – larger accounts or households generally receive more favorable pricing;
- level of services required – accounts requiring more services typically have higher fees; and
- level of trading activity and active portfolio management – actively managed accounts generally have higher fees than accounts that have less trading (e.g., fixed income accounts or "buy and hold" portfolios).

If a client enters into an investment management services relationship on a day other than the first day of a calendar quarter, we will pro rate our fee based on the number of days remaining in the quarter. Similarly, if a client terminates an investment management services relationship with us on a day other than the last day of a calendar quarter, we will pro rate our fee based on the number of days during the quarter that our investment management services were provided and will promptly refund any prepaid but unearned portion of the fee.

By signing the firm's advisory agreement, as well as the custodian account opening documents, the client will be authorizing the withdrawal of our investment management advisory fees from their account. All fees will be noted on account statements provided by the custodian of record. The withdrawal of these fees will be accomplished by the selected custodian, not by our firm, and the custodian will remit our fee directly to our firm. If a client prefers to directly pay our firm, we will invoice the client for the fee payment within 15 business days of each billing cycle.

### **Selection of Other Advisers**

We do not charge you a separate fee for the selection of other advisers. We will share in the advisory fee you pay directly to the third-party manager. The advisory fee you pay to the third-party manager is established and payable in accordance with the brochure provided by each TPM to whom you are referred. These fees may or may not be negotiable. Our compensation may differ depending upon the individual agreement we have with each TPM. As such, a conflict of interest exists where our firm or persons associated with our firm has an incentive to recommend one TPM over another TPM with whom we have more favorable compensation arrangements or other advisory programs offered by TPMs with whom we have less or no compensation arrangements.

The fee is paid to the third-party manager in advance or arrears, on a monthly or quarterly basis, per the selected third-party manager's disclosures and ADV Brochures that we will provide to you. Our firm receives a portion of that fee for our due diligence, assistance in the selection, and ongoing consultation for this form of advisory services engagement, and our fee will be described in the engagement agreement. Account fees, including debits and credits, will be noted on account statements that the client receives from the custodian of record. The client's written authorization is required in order for the custodian of record to deduct advisory fees from their account. By signing the custodian account documents, the client is authorizing the withdrawal of advisory fees. Most third-party managers do not allow for direct payment (e.g., payment by check, etc.). Our portion of the advisory fee will be remitted directly to our firm via the third-party manager.

You might be required to sign an agreement directly with the recommended TPM(s). You can terminate your advisory relationship with the TPM according to the terms of your agreement with the TPM. You should review each TPM's brochure for specific information on how you can terminate your advisory relationship with the TPM and how refunds are processed, if applicable. You should contact our firm or TPM for questions regarding your advisory agreement with the TPM.

### **Sub-Adviser Relationships**

We have entered into a sub-advisory relationship with GeoWealth to provide back office, billing, and trading support through their platform. We pay a portion of our advisory fee, called a platform fee, to GeoWealth; however, you will not pay our firm a higher advisory fee as a result of our sub-advisory relationship with GeoWealth.

### **Termination of Services**

Either party may terminate the advisory agreement at any time by communicating the intent to terminate in writing. Blueprint Wealth Management will not be responsible for investment allocation, advice, or transactional services (except for limited closing transactions) upon receipt of a termination notice. It will also be necessary that we inform the custodian of record and/or third-party manager/sub-adviser that the relationship between the firm and the client has been terminated. We will return any of its prepaid, unearned fees within 30 days of our receipt of termination notice.

The termination of services and the refund of pre-paid advisory fees of the third-party managers is processed in accordance with the third-party manager's advisory contract, as disclosed above. If a third-party manager assesses fees in advance, our firm is under no obligation to return fees to a client who terminates their advisory contract with the third-party manager before the end of the billing period. The return of payment will occur via the third-party manager.

### **Additional Fees and Expenses**

As part of our investment advisory services to you, we may invest, or recommend that you invest, in mutual funds and exchange traded funds. The fees that you pay to our firm for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds or exchange traded funds to their shareholders. These fees will generally include a management fee and other fund

expenses. Fees charged by issuers are detailed in prospectuses or product descriptions and the client is encouraged to read these documents before investing. Our clients retain the right to purchase recommended or similar investments through their own service provider.

Any transactional or service fees (sometimes termed brokerage fees), individual retirement account fees, qualified retirement plan fees, custodian account termination fees, or wire transfer fees will be borne by the account holder per the custodian of record's separate fee schedule. We do not share in any portion of the transaction charges or service fees imposed by the broker-dealer or custodian. To fully understand the total cost you will incur, you should review all the fees charged by mutual funds, exchange traded funds, our firm, and others. For information on our brokerage practices, refer to the *Brokerage Practices* section of this brochure (Item 12).

### **Compensation for the Sale of Securities or Other Investment Products**

Associates providing investment advice on behalf of our firm, are licensed insurance agents and offer insurance products (i.e., fixed or indexed annuities and life insurance policies, etc.) through one or more affiliated companies. These associates will earn commission-based compensation and other forms of compensation, for selling insurance products including insurance products they sell to you. Certain associates, that also provide investment advice on behalf of our firm, are accountants or CPAs and offer accounting services and tax preparation services. These services are offered by the associates either in their individual capacities (i.e., as a CPA) or through an affiliated entity. Insurance commissions and fees for accounting services or tax preparation services earned by the associates are separate and in addition to our advisory fees.

These practices present a conflict of interest because associates, providing investment advice on behalf of our firm, who are insurance agents or accountants/CPAs have an incentive to recommend insurance products or accounting/tax preparation services to you for the purpose of generating commissions or additional compensation, respectively, rather than solely based on your needs. You are under no obligation, contractually or otherwise, to purchase insurance products or other services through any associate affiliated with our firm. Our advisory firm and its associates take their responsibilities seriously and only intend to recommend investments, insurance, accounting, or investment advisory services that we believe appropriate for each client. Please refer to the *Other Financial Industry Activities and Affiliations* section (Items 10) and the *Code of Ethics, Participation or Interest in Client Transactions and Personal Trading* section (Item 11) of this firm brochure, in addition to the associate's Form ADV Part 2B (Items 2 and 4) brochure supplement for details.

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

We do not accept performance-based fees or participate in side-by-side management. Our firm's advisory fees will not be based on a share of capital gains or capital appreciation (growth) of a client's account or any portion of managed funds also known as performance-based fees. Our fees will also not be based on side-by-side management, which refers to a firm simultaneously managing accounts that pay performance-based fees (such as a hedge fund) and those that do not.

## **Item 7 Types of Clients**

BluePrint Wealth Management provides its services to individuals and high-net-worth individuals, charitable organizations, and pension and profit-sharing plans. We encourage interested parties of all economic levels to seek our advisory services; we do not require minimum income, minimum asset levels or other similar preconditions. We will inform the client in advance of any account requirements of this nature involving recommended third-party managers. Our firm reserves the right to waive or

reduce certain fees based on unique individual circumstances, special arrangements, or preexisting relationships. We also reserve the right to decline services to any client or prospective client for any non-discriminatory reason.

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

### **Our Methods of Analysis and Investment Strategies**

We use one or more of the following methods of analysis or investment strategies when providing investment advice to you.

We utilize fundamental analysis, evaluating economic factors including interest rates, the current state of the economy, or the future growth of an industry sector. Our research is often drawn from sources that include financial periodicals, corporate rating services, research reports from economists and other industry professionals, company press releases, regulatory filings, and annual company reports. The challenge involving fundamental analysis is that information obtained may be incorrect; the analysis may not provide an accurate estimate of earnings, which may be the basis for a security's value. When a security's price adjusts rapidly to new information, such an analysis may result in unfavorable performance.

We utilize Modern Portfolio Theory which is a theory of investment which attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, by carefully diversifying the proportions of various assets. A portfolio that employs a passive, efficient markets approach (such as Modern Portfolio Theory) has the risk of generating lower-than-expected returns due to its broad diversification when compared to a portfolio more narrowly focused. In the event of a significant market correction, long-term "buy-and-hold" concepts can experience a loss of most or all their gains.

We recognize that each client's needs, goals, and tolerance for risk are different, subsequently, portfolio strategies and underlying investment vehicles will vary based on the client's requirements. The following strategies sample the general types of strategists that may be suggested. It is common to find a broad range of mutual funds and ETFs as the primary investment vehicle, however, individual equities and fixed income instruments (stocks and bonds) can be included when appropriate.

#### Passive Management

Passive management involves investing in a portfolio intended to mirror the returns and risk characteristics of a broad-market index (e.g., S&P 500, NASDAQ 100, etc.). Various approaches are employed to achieve this result with varying levels of success. With passive strategies, two primary factors for consideration are the strategies' success with replicating benchmark risk and return profiles and the cost associated with employing the strategy. Investors more concerned with excessive fees than excess or risk-managed returns will generally prefer to invest through these types of strategies.

#### Tax Conscious Investing

Depending on client circumstances and the type of account in question, tax-conscious investment strategies may be utilized to reduce the impact of taxes on the client's portfolio. Types of investment strategies which could satisfy this objective include low turnover portfolios such as long-term active investment management focusing on growth or qualified dividend income, passive/indexing strategies, municipal bond portfolios, and tax-focused active investment management strategies.

### Cash Management

In managing the cash maintained in your account, we utilize the exclusive cash vehicle (money market fund) made available by the custodian. There may be other cash management options away from the custodian available to you with higher yields or safer underlying investments.

### Third-Party Managers

We will not perform quantitative or qualitative analysis of individual securities when we recommend a third-party manager. Instead, we will advise you on how to allocate your assets among various classes of securities or third-party managers. We may replace or recommend replacing a third-party manager if there is a significant deviation in characteristics or performance from the stated strategy and/or benchmark.

As previously noted in the *Advisory Business* section, our investment strategies and advice may vary depending upon each client's specific financial situation. As such, we determine investments and allocations based upon your predefined investment parameters. Your restrictions and guidelines may affect the composition of your portfolio. **It is important that you notify us immediately with respect to any material changes to your financial circumstances, including for example, a change in your current or expected income level, tax circumstances, or employment status.**

### **Tax Considerations**

Our strategies and investments may have unique and significant tax implications. However, unless we specifically agree otherwise, and in writing, tax efficiency is not our primary consideration in the management of your assets. Regardless of your account size or any other factors, we strongly recommend that you consult with a tax professional regarding the investing of your assets.

Custodians and broker-dealers must report the cost basis of equities acquired in client accounts. Your custodian will default to the First-In First-Out ("FIFO") accounting method for calculating the cost basis of your investments. You are responsible for contacting your tax advisor to determine if this accounting method is the right choice for you. If your tax advisor believes another accounting method is more advantageous, provide written notice to our firm immediately and we will alert your account custodian of your individually selected accounting method. Decisions about cost basis accounting methods will need to be made before trades settle, as the cost basis method cannot be changed after settlement.

### **Recommendation of Particular Types of Securities**

We recommend various types of securities and we do not primarily recommend one particular type of security over another since each client has different needs and different tolerance for risk. Each type of security has its own unique set of risks associated with it and it would not be possible to list here all of the specific risks of every type of investment. Even within the same type of investment, risks can vary widely. However, in very general terms, the higher the anticipated return of an investment, the higher the risk of loss associated with the investment. A description of the types of securities we may recommend to you and some of their inherent risks are provided below.

### **Risk of Loss**

Our firm believes its strategies and investment recommendations are designed to produce the appropriate potential return for the given level of risk; however, there is no guarantee that an investment objective will be achieved. Past performance is not necessarily indicative of future results. Investing in securities involves risk of loss that clients should be prepared to bear. When evaluating risk, financial loss may be viewed differently by each client and may depend on many different risks, each of which may affect the probability and magnitude of any potential losses. While the following list is not exhaustive, we provide examples of such risk in the following paragraphs, and we believe it is important that our clients review and consider each prior to investing.

### Company Risk

When investing in securities, such as stocks, there is always a certain level of company or industry-specific risk that is inherent in each company or issuer. There is the risk that the company will perform poorly or have its value reduced based on factors specific to the company or its industry. This is also referred to as unsystematic risk and can be reduced or mitigated through diversification.

### Concentration Risk

When a portfolio focuses on an asset-class, country, region, industry, investment sector, or a type of investment, that portfolio can be subject to greater fluctuations in value based on that concentration compared to a portfolio that is more broadly diversified across a wider variety of investments.

### Defensive Risk

Due to concerns about possible market declines, on occasion we may allocate a portion of a portfolio to cash or cash equivalents. In doing so, we may miss opportunities to realize subsequent increases in the value of other investments.

### Equity (Stock) Risk

Common stocks are susceptible to general stock market fluctuations and to volatile increases or decreases in value as market confidence in and perceptions of their issuers change. If an investor held common stock or common stock equivalents of any given issuer, they may be exposed to greater risk than if they held preferred stocks and debt obligations of the issuer.

Preferred stocks can be affected by interest rate and liquidity risks (described in adjacent paragraphs). Also note that their dividend payment is not guaranteed; some are subject to a call provision, meaning the issuer can redeem its preferred shares on demand, and usually when interest rates have fallen.

### Exchange Traded Funds and Mutual Fund Risks

The risk of owning exchange traded funds ("ETFs") and mutual funds reflect their underlying securities (e.g., stocks, bonds, commodities, etc.). These forms of securities typically carry additional expenses based on their share of operating expenses and certain brokerage fees, which may result in the potential duplication of certain fees. Certain ETFs and indexed funds have the potential to be affected by "active risk," a deviation from its stated index (e.g., S&P 500).

The liquidity of the underlying stocks in the index can affect "ETF liquidity." Liquidity risk can result from an insufficient number of Active Participants performing their duties as intermediaries and liquidity providers in the ETF market. "Spread risk" may also occur, which is the difference between the bid and the ask price of a security. Due to the fact that ETF transactions are priced throughout the day and are traded on the exchanges like stocks, widening spreads may occur and have impact on certain portfolios or transactions. As with any security, if the ETF "fails," the investor may lose their gains and invested principal.

While many ETFs and index mutual funds are known for their potential tax-efficiency and higher "qualified dividend income" (QDI) percentages, there are asset classes within these investment vehicles or holding periods within that may not benefit. Shorter holding periods, as well as commodities and currencies (that may be a holding within an ETF or mutual fund), may be considered "non-qualified" under certain tax code provisions. A holding's QDI will be considered when tax-efficiency is an important aspect of the client's portfolio. We do not recommend leveraged or inverse ETFs.

Some mutual funds are sold through brokerage firms and assess a commission ("load") in addition to their underlying fees earlier noted, while others are offered through investment advisers, retirement plans and other institutions. "No load" funds are also available to the public through brokerage firms,

and they usually incur trading (brokerage) fees. If a client chooses to purchase a mutual fund through a broker/dealer on their own, they should consider the trading fees, internal operating costs, as well as potential commissions they may pay through that executing firm. Our firm is not a broker/dealer, nor are we or our staff associated with a broker/dealer, and (per Items 5 and 10) is not compensated by a "loaded" fund.

#### Fixed Income Risks

Various forms of fixed income instruments, such as bonds, money market or bond funds may be affected by various forms of risk, including:

- Call Risk - During periods of falling interest rates, issuers of callable bonds may call (redeem) securities with higher coupons or interest rates before their maturity dates. The owner of the bond would then lose any potential price appreciation above the bond's call price and would be forced to reinvest the unanticipated proceeds at lower interest rates, resulting in a decline in the owner's income.
  - Call risk is generally low for short-term bond funds, moderate for intermediate-term bond funds, high for long-term bond funds, and high for high-yield bonds.
- Credit Risk - The potential risk that an issuer would be unable to pay scheduled interest or repay principal at maturity, sometimes referred to as "default risk." Credit risk may also occur when an issuer's ability to make payments of principal and interest when due is interrupted. Bondholders are creditors of an issuer and have priority to assets before equity holders (e.g., stockholders) when receiving a payout from liquidation or restructuring. When defaults occur due to bankruptcy, the type of bond held will determine seniority of payment.
- Interest Rate Risk - The risk that the value of the fixed income holding will decrease because of an increase in interest rates. The longer the maturity of the bond, the more sensitive its value is to changes in interest rates. Bond prices and interest rate changes are inversely correlated.
- Prepayment Risk - The prepayment risk is the premature return of principal on a fixed-income security. When principal is returned early on a security, future interest payments will not be paid on that part of the principal. The owner of the security would lose any price appreciation above the principal and forced to reinvest the unanticipated proceeds possibly at lower interest rates, resulting in a decline of dividends, income, and returns. The risk of prepayment is most prevalent in fixed-income securities such as callable bonds and mortgage-backed securities.
- Reinvestment Risk - With declining interest rates, investors may have to reinvest interest income or principal at a lower rate.
- State Government and Municipal Securities Risk - State government and municipal securities are subject to various risks based on factors such as economic and regulatory developments, changes or proposed changes in the federal and state tax structure, deregulation, court rulings and other factors. Repayment of state and municipal securities depends on the ability of the issuer or project backing such securities to generate taxes or revenues. There is also a risk the interest on an otherwise tax- exempt municipal security may be subject to federal income tax. Unfavorable developments in any economic sector may have far-reaching ramifications on the overall state and/or municipal market.
- United States Government Securities Risk - US government securities are subject to varying interest rates and inflation risks. Not all US government securities are backed by the full faith and credit of the US government. Certain securities issued by agencies and instrumentalities of

the US government are only insured or guaranteed by the issuing agency or instrumentality, which must rely on its own resources to repay the debt. As a result, there is risk these entities will default on a financial obligation.

#### Horizon and Longevity Risk

The risk that your investment horizon is shortened because of an unforeseen event, for example, the loss of your job. This may force you to sell investments that you were expecting to hold for the long term. If you must sell at a time that the markets are down, you may lose money. Longevity Risk is the risk of outliving your savings. This risk is particularly relevant for people who are retired, or are nearing retirement.

#### Inflation Risk and Interest Rate Risk

Security prices and portfolio returns will likely vary in response to changes in inflation and interest rates. Inflation causes the value of future dollars to be worth less and may reduce the purchasing power of a client's future interest payments and principal. Inflation also generally leads to higher interest rates which may cause the value of many types of fixed income investments to decline.

#### Liquidity Risk

Liquidity risk is the inability to readily buy or sell an investment for a price close to the true underlying value of the asset due to a lack of buyers or sellers. There are times when there is no trading volume/market depth to support a security's current price. As such, the true value of the bond (for example) may not be supported by the current price. Conversely, when trading volume is high, there is also a risk of not being able to purchase a particular issue at the desired price.

#### Margin Risk

A securities transaction in which an investor borrows money to purchase a security, in which case the security serves as collateral on the loan. If the value of the shares drops sufficiently, the investor will be required to either deposit more cash into the account or sell a portion of the stock in order to maintain the margin requirements of the account. This is known as a "margin call." An investor's overall risk includes the amount of money invested plus the amount that was loaned to them.

#### Market Risk

Market risk, also called systematic risk, is that part of a security's risk that is common to all securities of the same general class (stocks and bonds) and thus cannot be eliminated by diversification. In cases where markets are under extreme duress, many securities lose their ability to provide diversification benefits.

#### Money Market Funds

A money market fund is managed to maintain a stable net asset value (NAV) of \$1 per share, the value of the fund may fluctuate, and the investor could lose money (termed "breaking the buck"). Money market funds are a type of mutual fund investing in high-quality, short-term debt securities, pays dividends that generally reflect short-term interest rates and seeks to maintain a stable NAV per share (typically \$1). An investment in a money market mutual fund is typically not insured or guaranteed by the Federal Deposit Insurance Corporation, National Credit Union Association, or any other government agency.

#### Operational Risk

The potential for loss resulting from inadequate or failed internal processes, systems, actions of people, or external events. Many industries institute policies and procedures to respond and initiate alternative or supporting operations following a significant business disruption, while others do not. The level of operational risk and appropriate response are not uniform in definition, requirement, or measurement, including within the financial services sector.

### Options Risks

Portfolio managers that we recommend may choose to use options in support of their investment strategy. The risks involving options trading are detailed in the Chicago Board Options Exchange's "The Characteristics and Risks of Standardized Options" brochure found at their website at: <http://www.cboe.com>. We have provided general considerations involving options in the following statements.

### Option Buyer's Risks

- risk of losing the entire investment in a relatively short period of time
- risk of losing the entire investment increases as an option goes out of the money and as expiration nears
- European style options that do not have secondary markets in which to sell options prior to expiration only realize their value upon expiration specific exercise provisions of a specific option contract may create enhanced risk, and
- regulatory agencies may impose exercise restrictions, which may deter the investor from realizing value.

### Option Seller's Risks

- options sold may be exercised at any time before expiration
- covered call traders forgo the right to profit when the underlying stock rises above the strike price of the call options sold and continues to risk a loss due to a decline in the underlying stock
- writers of a "naked call" risk unlimited losses if the underlying stock rises; the writer of a "naked put" risk unlimited losses if the underlying stock drops. The writer of naked positions run margin risks if the position goes into significant losses, which may include liquidation by the broker/dealer of record. In addition, the writer of a "naked call" is obligated to deliver shares of the underlying stock if those call options are exercised
- writers of call options can lose more money than a short seller of that stock on the same rise on that underlying stock due to leveraging used in option strategies
- call options can be exercised outside of market hours such that effective remedy actions cannot be performed by the writer of those options
- writers of stock options are obligated under the options that these writers sold even if a trading market is not available or that they are unable to perform a closing transaction, and
- value of the underlying stock may unexpectedly surge or drop which may lead to an automatic exercise.

### Research Data

When research and analyses are based on commercially available software, rating services, general market and financial information, or due diligence reviews, a firm is relying on the accuracy and validity of the information or capabilities provided by selected vendors, rating services, market data, and the issuers themselves. While our firm makes every effort to determine the accuracy of the information received, we cannot predict the outcome of events or actions taken or not taken, or the validity of all information researched or provided which may or may not affect the advice on or investment management of an account.

## **Item 9 Disciplinary Information**

We are required to disclose the facts of any legal or disciplinary events that are material to a client's evaluation of our advisory business or the integrity of our management. We do not have any required disclosures under this item.

## Item 10 Other Financial Industry Activities and Affiliations

### Arrangements with Affiliated Entities

The following companies are either under common control and ownership our advisory firm through RSC Insurance Brokerage, Inc. and/or are owned and/or controlled by firm associates:

- Parady Financial Group, Inc. - a licensed insurance agency that provides insurance planning to its clients using fixed and indexed annuities and life insurance products
- Parady Health Solutions, LLC - a licensed insurance agency that offers health insurance to its clients
- Parady Group, LLC - a licensed insurance agency offering fixed and indexed annuities and life insurance products to its clients
- Parady West, LLC - a licensed insurance agency that offers income planning using fixed and indexed annuities and life insurance products to its clients
- Red Tree Retirement, LLC - a licensed insurance agency that provides income planning fixed and indexed annuities and life insurance products to its clients (not available to current advisory firm clients)
- Parady Tax Solutions, LLC - provides income tax preparation and planning
- Accountancy, LLC - provides income tax preparation and planning, and
- Kathleen Laseter CPA, LLC - provides income tax preparation and accounting services.

Associates of our advisory firm are licensed to sell fixed and/or indexed life insurance and annuity products. In their capacities as licensed insurance agents of one or more of our affiliated insurance agencies, they recommend to clients or prospective clients the purchase of certain insurance products. These individuals will receive compensation for the sale of those products. The recommendation and sale of insurance products by our advisory representatives, in their capacities as insurance agents of one or more of our affiliates, presents a conflict of interest to the extent that they receive insurance commissions or other compensation for those activities. Clients are under no obligation to purchase insurance products through our advisory representatives and may do so through any insurance agent or insurance agency they choose.

Our clients are generally referrals from one or more of our affiliates. While we do not pay referral fees to our affiliates or share our revenues with our affiliates as a result of the referrals we receive, the referral process presents a conflict of interest because each referral can result in additional revenue to our overall corporate organization. We strive to act in the best interests of each client and only recommend our services to prospective clients when we believe our services would benefit those prospective clients. Prospective clients are not required to retain us for investment advisory services and may do business with the investment advisory firm of their choosing.

On occasion, we refer our clients to one of our affiliates for insurance or tax services. BluePrint Wealth Management is not compensated in any way for those referrals. At no time will there be tying between business practices and/or services; a condition where a client or prospective client would be required to accept one product or service which is conditional upon the selection of a second, distinctive tied product or service. Please refer to the *Fees and Compensation* section (Item 5) for additional disclosures related to associates and their insurance agent and accounting/CPA capacities.

### Revenue Sharing Arrangements

#### Sub-adviser Relationships

To assist our firm with some of its "back-office" operations and technology solutions, such as access to a trading platform, billing, and account rebalancing, performance reports, client portal/account access, etc., we use the services of GeoWealth Management LLC ("GeoWealth"), an SEC-registered

investment adviser (CRD # 148222). Additional information involving our relationship with GeoWealth is described in the *Advisory Fees* and *Fees and Compensation* sections (Item 4 and 5) of this firm brochure. Blueprint Wealth Management is not affiliated with GeoWealth; nor do they supervise our advisory firm and its associates. While GeoWealth is a key operational partner to our firm, they are not acting as an independent custodian to our clients' accounts and therefore do not maintain client account assets. We do, however, have an agreement with GeoWealth and pay them a fee from our revenue for their services.

#### Selection of Other Advisers

Third-party managers are compensated for their respective services by the client and Blueprint Wealth Management receives a portion of the advisory fee that is assessed. We have an incentive to recommend one third-party manager over another if less favorable compensation or service arrangements were to be offered to us by another TPM with whom we have more favorable compensation arrangements or other advisory programs offered by TPMs with whom we have less or no compensation arrangements. In light of this conflict of interest, we will review our recommendations and "mix of business" based on the client's investment parameters with respect to all of our offerings. Clients' fees assessed through these engagements can be higher or lower had a client obtained advisory services directly from the third-party manager or if the client purchased similar underlying investments on their own. Clients are encouraged to review all our offerings and their stated fees prior to the engagement, and each client has the right to purchase recommended or similar investments through their own provider. It should be noted that certain third-party managers and/or underlying investments may not be available to self-directed investors or at the same cost.

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

### **Description of Our Code of Ethics**

We strive to comply with applicable laws and regulations governing our practices. Therefore, our Code of Ethics includes guidelines for professional standards of conduct for persons associated with our firm. Our goal is to protect your interests at all times and to demonstrate our commitment to our fiduciary duties of honesty, good faith, and fair dealing with you. All persons associated with our firm are expected to adhere strictly to these guidelines. Persons associated with our firm are also required to report any violations of our Code of Ethics. Additionally, we maintain and enforce written policies reasonably designed to prevent the misuse or dissemination of material, nonpublic information about you or your account holdings by persons associated with our firm.

Clients or prospective clients may obtain a copy of our Code of Ethics by contacting us at the telephone number on the cover page of this brochure.

### **Participation or Interest in Client Transactions**

Neither our firm nor any persons associated with our firm has any material financial interest in client transactions beyond the provision of investment advisory services as disclosed in this brochure.

### **Personal Trading Practices**

Our firm or persons associated with our firm may buy or sell the same securities that we recommend to you or securities in which you are already invested. A conflict of interest exists in such cases because we have the ability to trade ahead of you and potentially receive more favorable prices than you will receive. To mitigate this conflict of interest, it is our policy that neither our firm nor persons associated with our firm shall have priority over your account in the purchase or sale of securities. However, persons associated with our firm are permitted to participate in aggregated trades with client accounts as described below.

## **Aggregated Trading**

Our firm or persons associated with our firm may buy or sell securities for you at the same time we or persons associated with our firm buy or sell such securities for our own account. We may also combine our orders to purchase securities with your orders to purchase securities ("aggregated trading"). Refer to the *Brokerage Practices* section in this brochure for information on our aggregated trading practices.

## **Item 12 Brokerage Practices**

We recommend the brokerage and custodial services of National Financial Services LLC and Fidelity Brokerage Services LLC (together with affiliates, "Fidelity"), Members NYSE and SIPC, for investment management accounts. Your assets must be maintained in an account at a "qualified custodian," generally a broker-dealer or bank. In recognition of the value of the services the Custodian provides, you may pay higher commissions and/or trading costs than those that may be available elsewhere. Our selection of custodian is based on many factors, including the level of services provided, the custodian's financial stability, and the cost of services provided by the custodian to our clients, which includes the yield on cash sweep choices, commissions, custody fees and other fees or expenses.

We seek to use a custodian who will hold client assets and execute transactions on terms that are overall advantageous when compared to other available providers and their services. Our firm considers a wide range of factors, including, among others, these:

- combination of transaction execution services along with asset custody services (generally without a separate fee for custody)
- capability to execute, clear and settle trades (buy and sell securities for an account)
- capabilities to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- breadth of investment products made available (stocks, bonds, mutual funds, ETFs, etc.)
- availability of investment research and tools that assist us in making investment decisions
- quality of services
- competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate them
- reputation, financial strength, and stability of the provider
- their prior service to us and our other clients, and
- availability of other products and services that benefit us, as discussed below.

Accounts served by a third-party manager are to be maintained at one or more custodians that have been selected by the respective third-party investment manager and they will be disclosed in the third-party manager's disclosure documents and account opening forms.

## **Research and Other Soft Dollar Benefits**

We do not have any soft dollar arrangements.

## **Economic Benefits**

As a registered investment adviser, we have access to the institutional platform of your account custodian. As such, we will also have access to research products and services from your account custodian and/or other brokerage firm. These products are in addition to any benefits or research we pay for with soft dollars, and may include financial publications, information about particular companies and industries, research software, and other products or services that provide lawful and appropriate assistance to our firm in the performance of our investment decision-making responsibilities. Such research products and services are provided to all investment advisers that utilize the institutional services platforms of these firms, and are not considered to be paid for with soft dollars. However, you

should be aware that the commissions charged by a particular broker for a particular transaction or set of transactions may be greater than the amounts another broker who did not provide research services or products might charge.

### **Fidelity Institutional**

We participate in the institutional adviser program offered by Fidelity Institutional. Fidelity Institutional provides clearing, custody, or other brokerage services through National Financial Services LLC or Fidelity Brokerage Services LLC (together with affiliates, "Fidelity"), Members NYSE/SIPC. While we recommend that our clients use Fidelity as their custodian, the client must decide whether to do so, and will open the account by entering into an account agreement directly with Fidelity. We do not open accounts for clients, but we will assist our clients in doing so. If you do not wish to place your assets with Fidelity, then we cannot manage your account. Not all advisers require their clients to direct brokerage. Please see the directed brokerage section below for additional information.

Fidelity charges our firm a separate asset-based fee for custody services provided to client's accounts as described in this section. However, alternative investments incur a separate fee that is not included in the asset-based fee we pay to Fidelity. If applicable, you will be charged an annual custody fee of \$250 per position for alternative investments. Fidelity is compensated by charging you commissions or other fees on trades that it executes or that settle into your Fidelity account. Certain trades (for example, many mutual funds and ETFs) may not incur Fidelity commissions or transaction fees. Fidelity is also compensated by earning interest on the uninvested cash in your account in Fidelity's cash and core sweep vehicles.

Fidelity's commission rates applicable to our client accounts were negotiated based on the condition that our clients collectively maintain a minimum asset level in accounts at Fidelity. This commitment benefits you because the overall commission rates you pay are lower than they would be otherwise. In addition to commissions, Fidelity charges you a flat dollar amount as a "prime broker" or "trade away" fee, on non-international trade-aways, for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your Fidelity account. International trade-aways fees are not included in the flat fee arrangement. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we have Fidelity execute most trades for your account. The following is a breakdown of the negotiated commissions for the routine transactions that you pay to Fidelity:

<b>Security Type</b>	<b>Commission Range per Transaction*</b>
Equities	\$0 - \$4.95
ETFs	\$0 - \$4.95
Mutual Funds	\$0 - \$30.00
Fixed Income	\$0 - \$2.50 per bond
Trade Away Fee	\$20.00
Alternatives	\$100.00

*\*Premiums apply for international trades, accounts not enrolled in eDelivery, and certain manual and/or block trades via trading desk. Non-routine transactions can have a different fee schedule than what is published above. Minimums apply to certain transaction types. Please contact BluePrint or Fidelity for questions or additional information on commissions or other transaction fees.*

Fidelity provides us with access to its institutional brokerage -- trading, custody, reporting and related services - many of which are not typically available to a "retail investor." They also directly or indirectly make available various support services to our advisory firm. Some of those services help us manage or administer our clients' accounts, while others help us manage and grow our business. These support services are generally available to us on an unsolicited basis (we do not have to request them) and at no charge to us as long as we keep a certain level of our clients' assets in accounts at Fidelity. If we have less than \$25,000,000 of client assets at Fidelity, they charge our firm a quarterly service fee of \$2,500 that we pay from our operating account. Our custodian's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Fidelity include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients, such as those services described in previous paragraphs that generally benefit our clients. Note that we are not compensated for trade routing/order flow, nor are we paid commissions on such trades. We do not receive interest on an account's cash balance.

Fidelity makes available to our firm, directly or indirectly, other products and services that benefit us but do not directly benefit each of our clients' accounts. These products and services assist us in managing and administering our clients' accounts. They include investment research, both from the custodian's own and that of third parties. We use this research to service all or some substantial number of our clients' accounts. In addition to investment research, they also make available software and other technology that:

- provides access to client account data (such as duplicate trade confirmations and account statements);
- facilitates trade execution and allocates aggregated trade orders for multiple client accounts;
- provides pricing and other market data;
- facilitates payment of our fees from our clients' accounts; and
- assists with back-office functions, recordkeeping, and client reporting.

Fidelity also directly or indirectly provide other services intended to help us manage and further develop our business enterprise, such as:

- educational conferences and events;
- technology, compliance, legal, and business consulting;
- publications and conferences on practice management and business succession; and
- access to employee benefits providers, human capital consultants and business insurance providers.

Fidelity provides some of these services itself. In other cases, they arrange for third-party providers to offer those services to us. They also discount or waive its fees for some of these services or pay all or a part of a third party's fees. They also provide us with other benefits such as occasional business entertainment of our personnel. Certain tools, discounts and services, made available directly or indirectly by Fidelity, benefit our advisory firm but do not directly benefit each client account. The availability of these services benefits our firm because we do not have to produce or purchase them as long as clients maintain assets in accounts at our preferred custodian. There is a conflict of interest since our firm has an incentive to select or recommend a custodian based on our firm's interest in receiving these benefits rather than the client's interests in receiving favorable trade execution.

It is important to mention that the benefit received by our firm through participation in any custodian's program does not depend on the amount of brokerage transactions directed to that custodian, and our selection of a custodian is primarily supported by the scope, quality, and cost of services provided as a whole, not just those services that benefit only our advisory firm. Further, we will act in the best interest

of our clients regardless of the custodian we may select. Our firm conducts periodic assessments of any recommended service provider which generally involves a review of the range and quality of services, reasonableness of fees, among other items, in comparison to industry peers.

### **Brokerage for Client Referrals**

We do not receive client referrals from broker-dealers in exchange for cash or other compensation, such as brokerage services or research.

### **Directed Brokerage**

We routinely require that you direct our firm to execute transactions through Fidelity. As such, we may be unable to achieve the most favorable execution of your transactions (i.e., greater spreads or less favorable net prices, etc.) and you may pay higher brokerage commissions or other transaction costs than you might otherwise pay through another broker-dealer that offers the same types of services. Not all advisers require their clients to direct brokerage.

### **Aggregating Securities Transactions**

Trade aggregation involves the purchase or sale of the same security for several clients/accounts at approximately the same time. Aggregated orders are completed to obtain better execution, negotiate favorable transaction rates, or to allocate equitably among multiple client accounts should there be differences in prices, brokerage commissions or other transactional costs that might otherwise be unobtainable through separately placed orders.

Transactions for each client generally will be effected independently, unless we decide to purchase or sell the same securities for several clients at approximately the same time. We may, but are not obligated to, combine multiple orders for shares of the same securities purchased for advisory accounts we manage (this practice is commonly referred to as "aggregated trading"). We will then distribute a portion of the shares to participating accounts in a fair and equitable manner. Generally, participating accounts will pay a fixed transaction cost regardless of the number of shares transacted. In certain cases, each participating account pays an average price per share for all transactions and pays a proportionate share of all transaction costs on any given day. In the event an order is only partially filled, the shares will be allocated to participating accounts in a fair and equitable manner, typically on a pro-rata basis. Accounts owned by our firm or persons associated with our firm may participate in aggregated trading with your accounts; however, they will not be given preferential treatment.

### **Non-Aggregated Securities Transactions**

From time to time, we change investment allocations after we have reviewed the client's portfolio and financial situation during our annual meeting with specific clients. We typically meet with different clients at different times of the year. When this occurs we may not aggregate orders, or only aggregate the orders for clients who we met with on or about the same time.

Note that when trade aggregation is not allowed or infeasible and necessitates individual transactions (e.g., withdrawal or liquidation requests, odd-lot trades, etc.), an account may potentially be assessed higher costs or less favorable prices than those where aggregation has occurred.

### **Trade Errors**

In the event a trading error occurs in your account, our policy is to restore your account to the position it should have been in had the trading error not occurred. Depending on the circumstances, corrective actions may include canceling the trade, adjusting an allocation, and/or reimbursing the account.

## **Mutual Fund Share Classes**

Mutual funds are sold with different share classes, which carry different cost structures. Each available share class is described in the mutual fund's prospectus. When we purchase, or recommend the purchase of, mutual funds for a client, we select the share class that is deemed to be in the client's best interest, taking into consideration the availability of advisory, institutional or retirement plan share classes, initial and ongoing share class costs, transaction costs (if any), tax implications, cost basis and other factors. We also review the mutual funds held in accounts that come under our management to determine whether a more beneficial share class is available, considering cost, tax implications, and the impact of contingent or deferred sales charges.

## **Item 13 Review of Accounts**

### **Scheduled Reviews**

#### Investment Management Services

Investment management services accounts are reviewed on a quarterly or more frequent basis by an assigned internal portfolio manager. Client-level reviews are completed by the account's investment adviser representative on at least an annual basis. A copy of a revised investment guideline or asset allocation report in printed or digital format will be provided to the client upon request.

#### Selection of Other Advisers

For accounts served by a recommended third-party manager, we will periodically review reports provided to the client by the third-party manager and will contact the client at least annually to review their financial situation and objectives. We will communicate information to each third-party manager as warranted and will assist the client in understanding and evaluating the services provided by the third-party manager. In certain instances, the client may communicate directly with their selected third-party manager, but we ask that we be allowed to coordinate the session through our firm.

### **Interim Reviews**

Clients should contact our firm for additional reviews when they anticipate or have experienced changes in their financial situation (i.e., changes in employment, an inheritance, the birth of a new child, etc.), or if they prefer to change requirements involving their investment allocation. Interim reviews are conducted by the account's investment adviser representative and a copy of a revised investment guideline or asset allocation report in printed or digital format will be provided to the client upon request.

Additional portfolio reviews by a third-party manager and/or the client's investment adviser representative may be triggered by news or research related to a specific holding, a change in the view of an investment's merits, or news related to the macroeconomic climate affecting a sector or holding within that sector. A portfolio may be reviewed for an additional holding or when an increase in a current position is under consideration. Account cash levels above or below what we deem appropriate for the investment environment, given the client's stated tolerance for risk and investment objectives, may also trigger a review.

### **Client Reports**

Our clients receive account statements sent directly from custodians, mutual fund companies, transfer agents or brokerage companies where their investments are held. We urge all clients to carefully review these account statements for accuracy and clarity, and to ask questions when something is not clear.

Our firm provides written quarterly performance reports to our investment management services clients in printed or digital format that are calculated using a time-weighted rate of return methodology. These

reports are reviewed for accuracy by the client's assigned investment adviser representative prior to delivery. Our reports are intended to inform clients about investment performance over the current period, as well as various other time periods.

Investment management services clients may receive quarterly portfolio performance reports directly from their third-party manager; we do not back-test nor certify reports from an external party.

Clients are urged to carefully review and compare account statements that they have received from their account custodian with any report they may receive from our firm or any other source if that report contains any type of investment performance information.

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

As disclosed under the *Fees and Compensation* (Item 5) and *Other Financial Industry Activities and Affiliations* sections (Items 10) in this brochure, persons providing investment advice on behalf of our firm are licensed insurance agents and/or certified public accountants (CPAs) and offer insurance products and tax preparation services in their individual capacity or through one or more affiliated companies. For information on the conflicts of interest this presents, and how we address these conflicts, refer to the *Other Financial Industry Activities and Affiliations* section.

If we receive or offer an introduction to a client, we do not pay or earn a referral fee, nor are there established quid pro quo arrangements. Each client retains the right to accept or deny such referral or subsequent services.

We do not receive compensation from any third-party, outside of the *Selection of Other Advisers* (see Items 4, 5, & 10), in connection with providing investment advice to you nor do we compensate any individual or firm for client referrals.

Refer to the *Brokerage Practices* section above (Item 12) for disclosures on research and other benefits we receive resulting from our relationship with your account custodian.

## **Item 15 Custody**

Your independent qualified custodian will directly debit your account(s) for the payment of our advisory fees. This ability to deduct our advisory fees from your accounts causes our firm to exercise limited custody over your funds or securities. We do not have physical custody of any of your funds and/or securities. Your funds and securities will be held with a bank, broker-dealer, or other qualified custodian. Your custodian of record provides investment account transaction confirmations and account statements, which include debits and credits and any advisory fees for that period. Custodian statements are provided directly to our clients on at least a quarterly basis.

Our clients are reminded that if they receive a report from any source that contains investment performance information, they are urged to carefully review and compare their account statements received from their custodian of record to evaluate that report's accuracy.

Accounts are not to be maintained by our firm or any associate of our firm. In keeping with this policy involving our clients' funds or securities, our firm:

- restricts the firm or an associate from serving as trustee or having general power of attorney over a client account (unless it is an immediate family member);
- does not accept or forward client securities (i.e., stock certificates) erroneously delivered to our firm;

- prohibits the firm or an associate to have the client's bank or investment account access information (i.e., passwords and user identification);
- does not currently accept standing letters of authority to third-parties (SLOAs);
- will not collect advance fees of \$1,200 or more for services that are to be performed six months or more into the future; and
- prohibits an associate from having authority to directly withdraw securities or cash assets from a client account.

In the event our firm accepts SLOAs in the future, we have adopted policies and procedures to comply the requirements of the SEC's No-Action Letter ("NAL"), dated February 2017. Compliance with the conditions, as outlined in the NAL, allows the Company to exercise limited custody over your funds or securities pursuant to an SLOA without the requirement of a surprise examination.

## Item 16 Investment Discretion

### Investment Management Services

Before we can buy or sell securities on your behalf, you must first sign our discretionary management agreement and the appropriate trading authorization forms.

You may grant our firm discretion over the selection and amount of securities to be purchased or sold for your account(s) without obtaining your consent or approval prior to each transaction. You may specify investment objectives, guidelines, and/or impose certain conditions or investment parameters for your account(s). For example, you may specify that the investment in any particular stock or industry should not exceed specified percentages of the value of the portfolio and/or restrictions or prohibitions of transactions in the securities of a specific industry or security. Refer to the *Advisory Business* section in this brochure for more information on our discretionary management services.

### Selection of Other Advisers

By signing our discretionary management agreement, you grant our firm the authority to engage the services of a third-party manager or sub-adviser to manage all or a portion of your assets on a discretionary basis. We assume the discretionary authority to hire and fire any third-party managers or sub-advisers without your prior approval. In certain situations, you might be required to sign an agreement directly with the recommended TPM(s) that describes their limited account authority, as well as the third-party manager's custodian of record account opening documents that include the appropriate trading authorization forms.

## Item 17 Voting Client Securities

Account holders of record periodically receive proxies or other similar solicitations sent directly from their custodian or transfer agent. If we receive a duplicate copy, note that we do not forward these or any correspondence relating to the voting of clients' securities, class action litigation, or other corporate actions.

Our firm does not vote proxies on behalf of an account holder, including accounts served by our firm on a discretionary basis. We do not offer specific guidance on how to vote proxies, nor will we offer our position involving a claim or potential claim in any bankruptcy proceeding, class action securities litigation or other litigation or proceeding relating to securities held at any time in a client account, including, without limitation, to file proofs of claim or other documents related to such proceeding, or to investigate, initiate, supervise or monitor class action or other litigation involving client assets. We will answer limited questions via a scheduled meeting with respect to what a proxy voting request or other corporate matter may be and how to reach the issuer or their legal representative.

Investment management services clients should review their third-party manager's Form ADV Part 2A to determine that investment manager's proxy voting policies. Otherwise, each account holder will maintain responsibility for directing the manner in which proxies solicited by issuers of securities that are beneficially owned shall be voted, as well as making all other elections relative to mergers, acquisitions, tender offers or other legal matters or events pertaining to holdings.

Clients should consider contacting the issuer or their legal counsel involving specific questions they may have with respect to a particular proxy solicitation or corporate action.

## **Item 18 Financial Information**

BluePrint Wealth Management has not filed for bankruptcy petition at any time over the past ten years. Additionally, our firm does not have a financial condition or impairment that would prevent us from meeting our contractual commitments to clients.