



**Mallini Complete Financial Planning LLC  
d/b/a Together and/or Together Planning**

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**September 2023**

**FORM ADV PART 2A  
DISCLOSURE BROCHURE**

This brochure provides information about the qualifications and business practices of Mallini Complete Financial Planning LLC. If you have any questions about the contents of this brochure, contact us at 352-221-9300. 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 Mallini Complete Financial Planning LLC is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Mallini Complete Financial Planning 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

Since the last annual filing we have made the following changes:

Item 4 (Advisory Business) and Item 5 (Fees and Compensation) - The Financial Planning section in Item 4 and Item 5 was updated to describe the addition of a third-party insurance analysis platform. In addition, Together Planning is no longer offering college planning as a separate service. Item 4 and Item 5 were updated to remove the reference to college planning from these sections.

Item 10 (Other Financial Industry Activities and Affiliations) – Language was added to address any conflicts that could result in the use a third-party non-affiliated insurance platform.

Item 14 (Client Referrals and Other Compensation) – Item 14 was updated based on the SEC new marketing rule, to redefine the term solicitor to promoter.

Additional changes were made throughout for language consistency and clarification.  
September 2023 Update –

Item 12 (Brokerage Practices) - Our custodian TD Ameritrade merged with Charles Schwab. Language was updated to remove TD Ameritrade and add Charles Schwab.

Item 4 (Advisory Business), Item 5 (Fees and Compensation), and Item 7 (Types of Clients) - Together Planning added language to address SIMPLE IRA plans available as a new service offering. Item 4, Item 5, and Item 7 were updated to add language related to this new service.

Item 4 (Advisory Business), Item 5 (Fees and Compensation), and Item 7 (Types of Clients) - Together Planning is no longer offering ongoing financial planning services to clients who are not also asset management clients. Item 4 and Item 5 were updated to clarify one-time and ongoing financial planning services.

Item 5 (Fees and Compensation) – Together Planning has changed its fee schedule for its Portfolio Management and Financial Planning Services. Item 5 has been updated to reflect the new fee schedule.

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## Item 4 Advisory Business

### Description of Firm

Mallini Complete Financial Planning LLC is a registered investment adviser based in Gainesville, Florida. We are organized as a Limited Liability Company (LLC) under the laws of the State of Florida and are currently conducting business as "Together" and/or "Together Planning". We have been providing investment advisory services since June 2015. We are owned by George Thomas ("Tom") Mallini, Judson ("Jud") T. Mallini, Lia Mallini Bertelson and Virginia Mallini Knoll.

The following paragraphs describe our services and fees. 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" and "us" refer to Mallini Complete Financial Planning LLC and the words "you", "your" and "client" refer to you as either a client or prospective client of our firm.

### Portfolio Management Services

We offer discretionary and non-discretionary portfolio management services. Our investment advice is tailored to meet our clients' needs and investment objectives. If you retain our firm for portfolio management services, we will meet with you to determine your investment objectives, risk tolerance, and other relevant information at the beginning of our advisory relationship. We will use the information we gather to develop a strategy that enables our firm to give you continuous and focused investment advice and/or to make investments on your behalf. As part of our portfolio management services, we will customize an investment portfolio or invest your assets according to one or more model portfolios developed by our firm, according to your risk tolerance and investing objectives. Once we construct an investment portfolio for you, or select a model portfolio, we will monitor your portfolio's performance on an ongoing basis and will rebalance the portfolio as required by changes in market conditions and in your financial circumstances.

If you participate in our discretionary portfolio 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 (for example, limiting the types of securities that can be purchased or sold for your account) by providing our firm with your restrictions and guidelines in writing.

If you enter into non-discretionary arrangements with our firm, we must obtain your approval prior to executing any transactions on behalf of your account. You have an unrestricted right to decline to implement any advice provided by our firm on a non-discretionary basis. For accounts in which Together Planning does not have discretion, we will not have the ability to buy or sell securities for your account without written instructions. You may suffer or benefit from the trading restriction. For example, if Together Planning cannot reach you to obtain approval, or if you do not place the order upon receipt of the call, the price of the security to be purchased or liquidated may have fluctuated during this time.

### Financial Planning Services

We provide one-time and ongoing financial planning services. These services are typically in conjunction with investment management services. One-time planning may be provided as a standalone service. Ongoing financial planning is only offered in conjunction with investment management services. With our financial planning services, our goal is to help you worry less and enjoy your life more by developing a plan to help you meet the goals that are important to your career and your family. Our initial conversations will help us understand your values, goals, family structure,

health picture, and financial circumstances. Then we will collect data to develop a financial plan.

Together we will develop an action plan, along with our recommendations, to help you achieve your objectives. At the end of the initial planning period, you will receive written reports outlining your projections and our recommendations for each area of financial planning that is pertinent to you (retirement planning, investment planning, tax planning, insurance planning, education planning, and estate planning).

If you retain our firm for both financial planning and investment management services, you will also receive online access to your financial plan, access to your adviser when questions arise, a formal review of your plan and meeting once a year to check your progress and recommend adjustments, and assist with coordination with your tax planning, insurance, and estate planning professionals.,

Financial plans are based on your financial situation at the time we present the plan to you, and on the financial information you provide to us. You must promptly notify our firm if your financial situation, goals, objectives, or needs change during our engagement.

You are under no obligation to act on our financial planning recommendations. Should you choose to act on any of our recommendations, you are not obligated to implement the financial plan through any of our other investment advisory services. Moreover, you may act on our recommendations by placing securities transactions with any brokerage firm. Together Planning is not authorized or qualified to give legal advice or prepare legal documents, prepare, or amend the filing of personal income, gift, or estate tax returns, or to act as a trustee. You should consult your attorney, accountant, and other personal advisers for these services.

### **Retirement Plan Services – SIMPLE IRA Plans**

Together Planning will provide investment advisory services to individuals participating in an employee sponsored Simple Plan. Plans will be administered by American Fund Services (AFS) and the Client will execute documents with the Custodian, Capital Bank and Trust, authorizing Together Planning to trade in your account. Together Planning will oversee the plan and assist you in establishing and managing your account. Together Planning is available for consultation and offers annual online review meetings.

### **Additional Services - Use of Third-Party Insurance Analysis Platform**

As part of our portfolio management and financial planning services Together Planning reviews your overall allocation, including your existing annuities / insurance products, if applicable. Upon review of your financial status, Together Planning may propose that you include, as part of your financial portfolio, one or more types of products that are not part of the investment advisory services provided by Together Planning, such as insurance products. If you choose to include such a product in your financial portfolio, Together Planning recommends that you work closely with your attorney, accountant, insurance agent and other related professionals. Incorporation of the non-advisory financial product into your financial plan is entirely at your discretion.

To assist with this review, Together Planning has entered into an agreement with a non-affiliated insurance firm to provide solutions to clients with existing insurance / annuity products. This agreement provides our clients access to a platform of insurance products by DPL Financial Partners, LLC ("DPL"). As a client of Together Planning, you are under no obligation to use DPL's service, and may seek insurance advice from any licensed agent. The insurance products and fee structures available from DPL may differ from those available from other third-party insurance agents. Together Planning recommends that you fully evaluate products and fee structures to determine which arrangements are most favorable prior to making an investment decision. Together Planning does not receive

compensation for insurance products selected by the investor, whether secured through DPL or any other agent. In some cases, Together Planning may charge an asset management fee on insurance and annuity products that are part of your portfolio. Please refer to Item 5 Fees and Compensation for additional details.

### **Advisory Consulting Services**

We offer consulting services that primarily involves advising clients on specific financial-related topics. The topics we address may include, but are not limited to, risk assessment/management, investment planning, financial organization, or financial decision making/negotiation. These engagements are more limited in scope and are billed on an hourly basis.

### **IRA Rollover Recommendations**

As part of our investment advisory services to you, we may recommend that you withdraw the assets from your employer's retirement plan and roll the assets over to an individual retirement account ("IRA") that we will manage on your behalf. If you elect to roll the assets to an IRA that is subject to our management, we will charge you an asset-based fee as set forth in the agreement you executed with our firm. This practice presents a conflict of interest because persons providing investment advice on our behalf have an incentive to recommend a rollover to you for the purpose of generating fee-based compensation rather than solely based on your needs. You are under no obligation, contractually or otherwise, to complete the rollover. Moreover, if you do complete the rollover, you are under no obligation to have the assets in an IRA managed by our firm.

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.

### **Wrap Fee Programs**

We do not participate in any wrap fee program.

### **Types of Investments**

We primarily offer advice on equity securities ("stocks"), corporate debt securities ("bonds"), master limited partnerships ("MLPs"), mutual funds and exchange traded funds ("ETFs"). Additionally, we may advise you on various types of investments based on your stated goals and objectives. We may also provide advice on any type of investment held in your portfolio at the inception of our advisory relationship. You may request that we refrain from investing in particular securities or certain types of securities. You must provide these restrictions to our firm in writing.

We are not a broker, nor are we insurance agents. Therefore, we do not receive commissions.

## **Assets Under Management**

As of January 1, 2023, we provide continuous management services for \$97,821,633 in client assets on a discretionary basis, and \$369,378 in client assets on a non-discretionary basis.

## **Item 5 Fees and Compensation**

### **Portfolio Management Services**

Our fee for portfolio management services is based on a percentage of the assets in your account and is set forth in the following annual fee schedule:

#### **Annual Fee Schedule**

##### **Assets Under Management Annual Fee\***

\$0 - \$1,000,000	1.50%
\$1,000,000-\$2,000,000	1.0%
Above \$2,000,000	0.50%

Our annual portfolio management fee is billed and payable, quarterly in arrears, based on the balance at end of billing period.

If the portfolio management 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. Our advisory fee is negotiable, depending on individual client circumstances.

At our discretion, we may combine the account values for family members (whether living in the same household or living separately) to determine the applicable advisory fee. For example, we may combine account values for you and your minor and/or adult children, joint accounts with your spouse, and other types of family related accounts. Combining account values may increase the asset total, which may result in your paying a reduced advisory fee based on the available breakpoints in our fee schedule stated above.

We will deduct our fee directly from your account through the qualified custodian holding your funds and securities. We will deduct our advisory fee only when the following requirements are met:

- You provide our firm with written authorization permitting the fees to be paid directly from your account held by the qualified custodian.
- We send you an invoice showing the amount of the fee, the value of the assets on which the fee is based, the time period covered by the fee, and the specific manner in which the fee was calculated.
- The qualified custodian agrees to send you a statement, at least quarterly, indicating all amounts dispersed from your account including the amount of the advisory fee paid directly to our firm.

There are circumstances when fees are paid by check. In these instances, the client will receive an invoice. We encourage you to reconcile our invoices with the statement(s) you receive from the qualified custodian. If you find any inconsistent information between our invoice and the statement(s) you receive from the qualified custodian, call our main office number located on the cover page of this brochure. You may terminate the portfolio management agreement upon 30 day Written notice. You



will incur a pro rata charge for services rendered prior to the termination of the portfolio management agreement, which means you will incur advisory fees only in proportion to the number of days in the quarter for which you are a client. If you have pre-paid advisory fees that we have not yet earned, you will receive a prorated refund of those fees.

### **Financial Planning Services**

One-time Planning Fee: Our one-time financial planning fee is dependent on the complexity of your situation and ranges between \$4,500 and \$10,000. We require a \$1,200 deposit paid in advance of starting the initial plan and the remaining portion of the fee is due upon completion of the financial plan.

We find that we can provide a deeper level of service when we provide both financial planning and asset management to our clients, so we prefer to enter into relationships where we can provide both. For this reason, we will sometimes discount the financial planning fee or waive it altogether at the beginning of a new relationship if a client is also engaging our firm for portfolio management.

We do not require you to pay fees six or more months in advance and in excess of \$1,200.

You may terminate the financial planning agreement before completion of the initial plan by providing written notice to our firm. You will incur a pro rata charge for services rendered prior to the termination of the agreement. However, if you have pre-paid advisory fees that we have not yet earned, you will receive a prorated refund of those fees.

### **Retirement Plan Advisory Services – SIMPLE IRA Plans**

Fees shall be calculated by AFS for each quarterly period ending the last business day of February, May, August, and November and will be calculated on the average daily net asset value of the assets during the quarter. Fees will be directly debited from your account by AFS. The advisory fee for clients invested in Simple IRA plans is 1.50%. In addition to the advisory fee, clients will incur a one-time setup fee of \$10-\$25 and an annual fee of \$10-\$25 charged directly by AFS.

### **Additional Services - Third Party Insurance Analysis Platform**

Together Planning does not receive any commissions from insurance products and does not charge clients a fee for using the platform provided by DPL. However, there are fees associated with insurance products. Please read the product brochure for fees associated with any insurance products.

This additional service is offered as part of our investment management and financial planning platform and as such, Together Planning will include in your overall asset allocation and monitoring services. Depending on the product, Together Planning may charge you a reduced asset under management fee of 0.50%, as outlined in your advisory agreement. This fee is billed and payable, quarterly in arrears, based on the balance at end of billing period, either directly from the contract value or through an invoice sent to you for payment. This fee may be waived at the discretion of management.

### **Advisory Consulting Services**

We charge an hourly fee for advisory consulting services. The hourly rate is \$300 and is dependent on the level of experience of the professional providing the consulting service. Our consulting fee is negotiable depending upon the scope and complexity of the services to be rendered and individual client circumstances. You may terminate the advisory consulting services agreement upon written or electronic notice to our firm.

The fees are due and payable as invoiced. The estimated number of hours will be approved by the client before the work is done, and the charges will be invoiced upon completion. If the time required will exceed the original estimate, the client will be notified. Time will be billed in increments of one tenth of one hour. No fees in excess of \$1,200 will be charged more than six months in advance. For



recurring consulting services, fees will be invoiced only when services are rendered, and not on an automatic ongoing basis.

### **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 (described in each fund's prospectus) to their shareholders. These fees will generally include a management fee and other fund expenses. You will also incur transaction charges and/or brokerage fees when purchasing or selling securities. These charges and fees are typically imposed by the broker-dealer or custodian through whom your account transactions are executed. We do not share in any portion of the brokerage fees/transaction charges 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 6 Performance-Based Fees and Side-By-Side Management**

We do not accept performance-based fees or participate in side-by-side management. Performance-based fees are fees that are based on a share of capital gains or capital appreciation of a client's account. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees. Our fees are calculated as described in the *Fees and Compensation* section above and are not charged on the basis of a share of capital gains upon, or capital appreciation of, the funds in your advisory account.

## **Item 7 Types of Clients**

We offer investment advisory services to individuals, including high net worth individuals, families, charitable organizations, retirement plans, and corporations or other businesses entities.

In general, we do not require a minimum dollar amount to open and maintain an advisory account; however, we have the right to terminate your account if it falls below a minimum size which, in our sole opinion, is too small to manage effectively.

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

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

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

**Fundamental Analysis** - involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience and expertise of the company's management, and the outlook for the company and its industry. The resulting data is used to measure the true value of the company's stock compared to the current market value.

**Risk:** The risk of fundamental analysis is that information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

**Cyclical Analysis** - a type of technical analysis that involves evaluating recurring price patterns and trends. Economic/business cycles may not be predictable and may have many fluctuations between long-term expansions and contractions.

**Risk:** The lengths of economic cycles may be difficult to predict with accuracy and therefore the risk of cyclical analysis is the difficulty in predicting economic trends and consequently the changing value of securities that would be affected by these changing trends.

**Modern Portfolio Theory (MPT)** - 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.

**Risk:** Market 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.

**Long-Term Purchases** - securities purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year.

**Risk:** Using a long-term purchase strategy generally assumes the financial markets will go up in the long-term which may not be the case. There is also the risk that the segment of the market that you are invested in or perhaps just your particular investment will go down over time even if the overall financial markets advance. Purchasing investments long-term may create an opportunity cost - "locking-up" assets that may be better utilized in the short-term in other investments.

**Short-Term Purchases** - securities purchased with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the securities' short-term price fluctuations.

**Risk:** Using a short-term purchase strategy generally assumes that we can predict how financial markets will perform in the short-term which may be very difficult and will incur a disproportionately higher amount of transaction costs compared to long-term trading. There are many factors that can affect financial market performance in the short-term (such as short-term interest rate changes, cyclical earnings announcements, etc.) but may have a smaller impact over longer periods of times.

Our investment strategies and advice may vary depending upon each client's specific situation. As such, we determine investments and allocations based upon your predefined objectives, risk tolerance, time horizon, financial information, liquidity needs and other various suitability factors. 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.

Moreover, custodians and broker-dealers must report the cost basis of equities acquired in client accounts on or after January 1, 2011. Your custodian will default to the FIFO (First-In First-Out) 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.

### **Risk of Loss**

Investing in securities involves risk of loss that you should be prepared to bear. We do not represent or guarantee that our services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines. We cannot offer any guarantees or promises that your financial goals and objectives will be met. Past performance is in no way an indication of future performance.

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

We primarily offer advice on equity securities ("stocks"), corporate debt securities ("bonds"), master limited partnerships ("MLPs"), mutual funds and exchange traded funds ("ETFs"). However, we may advise on other types of investments as appropriate for you 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.

### **Environment, Social and Corporate Governance Research and Risk Management**

The Company believes that Environmental, Social, and Governance (ESG) risks and opportunities have the potential to impact the financial performance of its investments and that considering ESG factors in the investment process may therefore create value and/or reduce risk. The Company recognizes the need to balance ESG considerations with existing investment mandates, portfolio construction guidelines, and return expectations across its funds and accounts. The use of ESG products is in an effort to reduce overall portfolio volatility and enhance risk-adjusted returns for our clients.

**Stocks:** There are numerous ways of measuring the risk of equity securities (also known simply as "equities" or "stock"). In very broad terms, the value of a stock depends on the financial health of the company issuing it. However, stock prices can be affected by many other factors including, but not limited to the class of stock (for example, preferred or common); the health of the market sector of the issuing company; and the overall health of the economy. In general, larger, better-established companies ("large cap") tend to be safer than smaller start-up companies ("small cap") are, but the mere size of an issuer is not, by itself, an indicator of the safety of the investment.

**Bonds:** Corporate debt securities (or "bonds") are typically safer investments than equity securities, but their risk can also vary widely based on: the financial health of the issuer; the risk that the issuer might default; interest rate movements (Interest Rate Risk); when the bond is set to mature; and, whether or not the bond can be "called" prior to maturity. When a bond is called, it may not be possible to replace it with a bond of equal character paying the same rate of return.

**Master Limited Partnerships:** Master Limited Partnerships ("MLPs") were designed similarly like an investment pooling vehicle with a specific goal in mind; to pass the income earned in some form of partnership directly to investors. In short, an MLP combines the pass-through tax treatment of a traditional partnership with the public tradability of a stock, much like a real estate investment trust does for the ownership of property. Annual tax reporting will consist of a K-1 instead of a 1099.

**Mutual Funds and ETFs:** Mutual funds and exchange traded funds (ETFs) are professionally managed collective investment systems that pool money from many investors and invest in stocks, bonds, short-term money market instruments, other mutual funds, other securities, or any combination

thereof. The fund will have a manager that trades the fund's investments in accordance with the fund's investment objective. While mutual funds and ETFs generally provide diversification, risks can be significantly increased if the fund is concentrated in a particular sector of the market, primarily invests in small cap or speculative companies, uses leverage (i.e., borrows money) to a significant degree, or concentrates in a particular type of security (i.e., equities) rather than balancing the fund with different types of securities. Exchange traded funds differ from mutual funds since they can be bought and sold throughout the day like stock and their price can fluctuate throughout the day. The returns on mutual funds and ETFs can be reduced by the costs to manage the funds. Also, while some mutual funds are "no load" and charge no fee to buy into, or sell out of, the fund, other types of mutual funds do charge such fees which can also reduce returns. Mutual funds can also be "closed end" or "open end". So-called "open end" mutual funds continue to allow in new investors indefinitely whereas "closed end" funds have a fixed number of shares to sell which can limit their availability to new investors.

**Fixed Indexed Annuities:** Fixed annuities are insurance products which protect against loss and generally offer fixed rates of return. The rates are typically based on the current interest rate environment. Fixed annuities are long-term investment vehicles and they are offered by licensed and regulated insurance companies. Early withdrawal may result in tax liability, penalties and/or surrender charges. These charges may result in a loss of bonus, indexed interest and fixed interest, and a partial loss of your principal. Bonus annuities may include annuitization requirements, lower capped returns, or other restrictions that are not included in similar annuities that don't offer a premium bonus feature. Riders are available at an additional cost and are subject to conditions, restrictions and limitations and benefits are generally not available as lump sum payout. Guarantees, if any, are backed by the financial strength and claims-paying ability of the issuing insurance company.

**Variable Annuities:** A variable annuity is a form of insurance where the seller or issuer (typically an insurance company) makes a series of future payments to a buyer (annuitant) in exchange for the immediate payment of a lump sum (single-payment annuity) or a series of regular payments (regular-payment annuity). The payment stream from the issuer to the annuitant has an unknown duration based principally upon the date of death of the annuitant. At this point, the contract will terminate, and the remainder of the funds accumulated forfeited unless there are other annuitants or beneficiaries in the contract. Annuities can be purchased to provide an income during retirement. Unlike fixed annuities that make payments in fixed amounts or in amounts that increase by a fixed percentage, variable annuities, pay amounts that vary according to the performance of a specified set of investments, typically bond and equity mutual funds. Many variable annuities typically impose asset-based sales charges or surrender charges for withdrawals within a specified period. Variable annuities may impose a variety of fees and expenses, in addition to sales and surrender charges, such as mortality and expense risk charges; administrative fees; underlying fund expenses; and charges for special features, all of which can reduce the return. Earnings in a variable annuity do not provide all the tax advantages of 401(k)s and other before-tax retirement plans. Once the investor starts withdrawing money from their variable annuity, earnings are taxed at the ordinary income rate, rather than at the lower capital gains rates applied to other non-tax-deferred vehicles which are held for more than one year. Proceeds of most variable annuities do not receive a "step-up" in cost basis when the owner dies like stocks, bonds and mutual funds do. Some variable annuities offer "bonus credits." These are usually not free. In order to fund them, insurance companies typically impose mortality and expense charges and surrender charge periods. In an exchange of an existing annuity for a new annuity (so-called 1035 exchanges), the new variable annuity may have a lower contract value and a smaller death benefit; may impose new surrender charges or increase the period of time for which the surrender charge applies; may have higher annual fees; and provide another commission for the broker.

## 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

Together Planning does not have any financial industry affiliations, however, as noted in Item 4, Together Planning may utilize a third-party non-affiliated platform through DPL to provide insurance products to our clients. Clients should be aware that there may be other insurance products that are offered by other insurance agents at a lesser cost than those recommended by DPL. Receipt of additional compensation, in the form of advisory fees charged by Together Planning on these assets, may cause incentive to recommend DPL to clients. To mitigate this conflict, Together Planning has adopted and strictly adheres to a Code of Ethics, wherein, among other things, Together Planning mandates that its IARs put their clients' interests first at all times. Together Planning discloses to clients the existence of all material conflicts of interest, including the potential for its firm and its employees to earn compensation from additional advisory fees charged to clients on insurance products purchased through DPL.

## 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, non-public 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. Additionally, 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 ("block trading"). Refer to the *Brokerage Practices* section in this brochure for information on our block trading practices.

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.

## **Item 12 Brokerage Practices**

We recommend the brokerage and custodial services of Schwab Institutional®, a division of Charles Schwab & Co., Inc. (Schwab), a FINRA-registered broker-dealer, member SIPC, to maintain custody of clients' assets and to effect trades for their accounts. Although Together Planning may recommend / require that clients establish accounts at Schwab, it is the client's decision to custody assets with Schwab. Together Planning is independently owned and operated and not affiliated with Schwab. We believe that Schwab provides quality execution services for you at competitive prices. Price is not the sole factor we consider in evaluating best execution. We also consider the quality of the brokerage services provided by Schwab, including the value of the firm's reputation, execution capabilities, commission rates, and responsiveness to our clients and our firm. In recognition of the value of the services Schwab provides, you may pay higher commissions and/or trading costs than those that may be available elsewhere.

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

We do not have any soft dollar arrangements.

### **Schwab Institutional**

We participate in the institutional advisor program offered by Schwab Institutional. Schwab provides Together Planning with access to its institutional trading and custody services, which are typically not available to Schwab retail investors. Schwab's brokerage services include the execution of securities transactions, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

For Together Planning client accounts maintained in its custody, Schwab generally does not charge separately for custody services but is compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed through Schwab or that settle into Schwab accounts.

Schwab Institutional also makes available to Together Planning other products and services that benefit Together Planning but may not directly benefit its clients' accounts. Many of these products and services may be used to service all or some substantial number of Together Planning's accounts, including accounts not maintained at Schwab.

Schwab's products and services that assist Together Planning in managing and administering clients' accounts include software and other technology that (i) provide access to client account data (such as trade confirmations and account statements); (ii) facilitate trade execution and allocate aggregated trade orders for multiple client accounts; (iii) provide research, pricing and other market data; (iv) facilitate payment of Together Planning's fees from its clients' accounts; and (v) assist with back-office functions, recordkeeping and client reporting.

Schwab Institutional also offers other services intended to help Together Planning manage and further develop its business enterprise. These services may include: (i) compliance, legal and business consulting; (ii) publications and conferences on practice management and business succession; and (iii) access to employee benefits providers, human capital consultants and insurance providers. Schwab may make available, arrange and/or pay third-party vendors for the types of services rendered to Together Planning. Schwab Institutional may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to



Together Planning. Schwab Institutional may also provide other benefits such as educational events or occasional business entertainment of Together Planning personnel. In evaluating whether to recommend or require that client's custody their assets at Schwab, Together Planning may take into account the availability of some of the foregoing products and services and other arrangements as part of the total mix of factors it considers and not solely the nature, cost or quality of custody and brokerage services provided by Schwab, which may create a potential conflict of interest.

### **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 Schwab. As such, we may be unable to achieve the most favorable execution of your transactions and you may pay higher brokerage commissions 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.

### **Block Trades**

We combine multiple orders for shares of the same securities purchased for discretionary advisory accounts we manage (this practice is commonly referred to as "block trading"). We will then distribute a portion of the shares to participating accounts in a fair and equitable manner. Subject to our discretion regarding factual and market conditions, when we combine orders, each participating account pays an average price per share for all transactions and pays a proportionate share of all transaction costs. In the event an order is only partially filled, the shares will be allocated to participating accounts in a fair and equitable manner, typically in proportion to the size of each client's order. Accounts owned by our firm or persons associated with our firm may participate in block trading with your accounts; however, they will not be given preferential treatment.

We do not block trade for non-discretionary accounts. Accordingly, non-discretionary accounts may pay different costs than discretionary accounts pay. If you enter into non-discretionary arrangements with our firm, we may not be able to buy and sell the same quantities of securities for you and you may pay higher commissions, fees, and/or transaction costs than clients who enter into discretionary arrangements with our firm.

### **Mutual Fund Share Class Selection**

Mutual funds generally offer multiple share classes available for investment based upon certain eligibility and/or purchase requirements. For instance, in addition to retail share classes (typically referred to as class A, class B and class C shares), funds may also offer institutional share classes or other share classes that are specifically designed for purchase by investors who meet certain specified eligibility criteria, including, for example, whether an account meets certain minimum dollar amount. Institutional share classes usually have a lower expense ratio than other share classes. When recommending investments in mutual funds, it is our policy to review and consider available share classes. Our policy is to select the most appropriate share classes based on various factors including but not limited to: minimum investment requirements, trading restrictions, internal expense structure, transaction charges, availability, and other factors. When considering all the appropriate factors, we can select a share class other than the 'lowest cost' share class. In order to select the most appropriate share class, we consider retail, institutional or other share classes of the same mutual fund. Regardless of such considerations, clients should not assume that they will be invested in the share class with the lowest possible expense ratio. Clients should ask their adviser whether a lower cost share class is available instead of those selected by the Firm. Together Planning periodically reviews the mutual funds held in client accounts to select the most appropriate share classes in light of its duty to obtain best execution.



## Item 13 Review of Accounts

### Portfolio Management Reviews

All relationships are under the supervision of Together Planning. Each relationship is assigned a primary Investment Adviser Representative to oversee the accounts. We will review your account performance and allocations periodically to ensure the advisory services provided to you are consistent with your investment needs and objectives. At least annually your investment adviser representative will meet with you to formally review your account. Additional reviews may be conducted based on various triggering circumstances, including, but not limited to: contributions and withdrawals, year-end tax planning, market moving events, security specific events, and/or changes in your risk/return objectives.

The individuals conducting reviews may vary from time to time, as personnel join or leave our firm.

We will provide you with additional or regular written reports in conjunction with account reviews. Reports we provide to you will contain relevant account and/or market-related information such as an inventory of account holdings and account performance, etc. You will receive trade confirmations and monthly or quarterly statements from your account custodian(s).

### Financial Planning Reviews

Your primary Investment Adviser Representative will monitor your financial plans periodically and will conduct a formal review of your financial plan annually to ensure that the planning advice made to you is consistent with your stated investment needs and objectives. You should contact us if any of your circumstances have changed, including, but not limited to marriage, divorce, birth, death, inheritance, lawsuit, retirement, job loss and/or disability, among others.

We recommend meeting with you annually to review and update your plan if needed. Additional reviews will be conducted upon your request. Written updates to the financial plan will be provided in conjunction with the review and will be made available to you through your client portal. Upon client request, we will deliver the written plan via email. If you implement financial planning advice by also engaging our firm for investment management services, you will receive trade confirmations and quarterly statements from relevant custodians.

## Item 14 Client Referrals and Other Compensation

We do not receive any compensation from any third party in connection with providing investment advice to you. Refer to the *Brokerage Practices* section above for disclosures on research and other benefits we may receive resulting from our relationship with your account custodian.

### **Promoters**

In order to receive a cash referral fee from our firm, Promoters must comply with the requirements of the jurisdictions in which they operate. If you become a client, the Promotor that referred you to our firm will receive either a one-time fixed referral fee at the time you enter into an advisory agreement with our firm or a percentage of the advisory fee you pay our firm for as long as you are a client with our firm, or until such time as our agreement with the Promotor expires. You will not pay additional fees because of this referral arrangement. Referral fees paid to a Promotor are contingent upon you entering into an advisory agreement with our firm. Therefore, a Promotor has a financial incentive to recommend our firm to you for advisory services. This creates a conflict of interest; however, you are not obligated to retain our firm for advisory services. Comparable services and/or lower fees may be available through other firms.

Together Planning has one agreement in place where we directly compensate non-employee (outside)

consultants, individuals, and/or entities (Promotor) for client referrals. We are no longer actively utilizing this Promotor and Together Planning will not receive any new investors from this arrangement, however, any existing referral fees will remain in effect.

## Item 15 Custody

Together Planning does not maintain physical possession of Client cash or securities. For certain clients, we deduct fees directly from client accounts. Together Planning is deemed to have custody of these client assets. Advisers are not required to obtain an independent verification of client funds and securities maintained by a qualified custodian if they have custody of the funds and securities solely as a consequence of their authority to make withdrawals from client accounts to pay advisory fees.

Client's cash and securities are maintained at a qualified custodian within the meaning of the Adviser's Act. You will receive account statements from the qualified custodian(s) holding your funds and securities at least quarterly. The account statements from your custodian(s) will indicate the amount of our advisory fees deducted from your account(s) each billing period. You should carefully review account statements for accuracy.

We will also provide you with an invoice reflecting the amount of the advisory fee deducted from your account. You should compare our invoice with the account statements from your account custodian(s) to reconcile the information reflected on each statement. If you have a question regarding your invoice, or if you did not receive an account statement from your custodian, contact us immediately at the telephone number on the cover page of this brochure.

There are currently no situations where Together Planning or its representatives serve as trustee for a client account. In the future, however, persons associated with our firm may serve as trustees for close family members who are also clients. In all cases, the persons associated with our firm would be appointed trustee as a result of a family or personal relationship with the trust grantor and/or beneficiary and not as a result of employment with our firm. Therefore, we are not deemed to have custody over the advisory accounts for which persons associated with our firm serve as trustee.

## Item 16 Investment Discretion

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.

If you enter into non-discretionary arrangements with our firm, we will obtain your approval prior to the execution of any transactions for your account(s). You have an unrestricted right to decline to implement any advice provided by our firm on a non-discretionary basis.

## **Item 17 Voting Client Securities**

We will not vote proxies on behalf of your advisory accounts. At your request, we may offer you advice regarding corporate actions and the exercise of your proxy voting rights. If you own shares of applicable securities, you are responsible for exercising your right to vote as a shareholder.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward any electronic solicitations to vote proxies.

## **Item 18 Financial Information**

Our firm does not have any financial condition or impairment that would prevent us from meeting our contractual commitments to you. We do not take physical custody of client funds or securities, or serve as trustee or signatory for client accounts, and we do not require the prepayment of more than \$1,200 in fees six or more months in advance nor have we filed a bankruptcy petition at any time in the past ten years. Therefore, we are not required to include a financial statement with this brochure.