

## Item 1: Cover Page

### Your Financial Pharmacist Planning, LLC

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(614) 618-5901

### Form ADV Part 2A – Firm Brochure

August 23, 2023

This Brochure provides information about the qualifications and business practices of Your Financial Pharmacist Planning, LLC (hereinafter “YFP Planning”). If you have any questions about the contents of this Brochure, please contact us at (614) 618-5901 or by emailing the Chief Compliance Officer, Tim Baker at [tbaker@yourfinancialpharmacist.com](mailto:tbaker@yourfinancialpharmacist.com).

The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority.

Additional information about YFP Planning is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov), which can be found using the firm’s CRD # 282918.

YFP Planning is registered as an Investment Adviser with the SEC. Registration as an Investment Adviser does not imply any level of skill or training.

## Item 2: Material Changes

The following material changes have been made to this Form ADV Part 2A since the filing dated May 25, 2023:

- Updated Foundational Financial Planning fee schedule (Item 5).
- Updated Student Loan Analysis fee schedule (Item 5).
- Added Retirement Plan Services for Small Business Owners (Item 4 and Item 5).

### **Future Changes**

From time to time, we may amend this Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Brochure or a summary of material changes shall be provided to each client annually, and if a material change occurs in the business practices of YFP Planning.

At any time, you may view the current Brochure online at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching for our firm name or by our CRD number 282918. You may request a copy of this Brochure at any time by contacting us at (614) 618-5901 or by emailing [tbaker@yourfinancialpharmacist.com](mailto:tbaker@yourfinancialpharmacist.com).

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## Item 4: Advisory Business

### Description of Advisory Firm

YFP Planning is registered as an Investment Adviser with the SEC. It was founded on January 6, 2016. YFP Planning is a wholly owned subsidiary of Your Financial Pharmacist, LLC (“YFP”), which offers education about general financial topics through podcasts, articles, and other media. Timothy Ulbrich, PharmD and Timothy Baker, CFP® are principals of YFP. As of 12/31/2022, YFP Planning reported \$16,651,410 in discretionary assets under management (AUM), and no non-discretionary assets under management.

### Types of Advisory Services

#### Wealth Management

- Overview: YFP Planning provides Wealth Management, which is designed for clients who are mid-career to clients in retirement. It involves a client working directly with a financial planner typically over an extended period of time. The client receives continuous access to a financial planner who creates and maintains the client’s financial plan and manages the client’s investments. The plan is reviewed at least annually.
- Scope: Depending on the client’s goals and balance sheet, Wealth Management may address some or all of the following:
  - Fundamentals
    - Account Aggregation and Net Worth: YFP Planning assists with the aggregation of client assets and liabilities to build a dynamic net worth statement.
    - Cash Flow: YFP Planning conducts a review of the client’s income and expenses to determine the current surplus or deficit.
    - Debt Management: YFP Planning helps clients to inventory their debt and determine appropriate repayment strategies. The firm may also make recommendations on how to best leverage the client’s debt to improve their financial position.
    - Savings Plan: YFP Planning may recommend the appropriate cash reserves for emergencies and other goals.
  - Insurance & Employee Benefits
    - Risk Management: A risk management review includes an analysis of a client’s exposure to major risks that could have an adverse impact on the client’s finances, such as premature death, disability or property and casualty losses. The firm may review current policies to identify gaps in coverage and recommend additional policies.
    - Employee Benefits: YFP Planning reviews employee benefits to ensure the client optimizes what is available including, but not limited to, insurance coverage and retirement plan benefits.
  - Investment Analysis & Management: This service may involve developing an asset allocation strategy to meet a client’s financial goals and risk tolerance, providing information on investment vehicles and strategies. It may involve accounts held at YFP

Planning's custodian or by an outside custodian. An example of this may be giving the client advice on their current 401(k) plan.

- Tax Planning Strategies: Advice may include ways to minimize current and future taxes as a part of the client's overall financial planning strategy.
- Retirement Planning: YFP Planning provides a retirement plan analysis by calculating the total amount needed in retirement. YFP Planning uses projections, such as Monte Carlo analysis, to show the probability of plan success. If the client is near retirement or already retired, advice may be given on appropriate distribution strategies to minimize the likelihood of running out of money or needing to alter spending during the client's retirement years. We may also advise clients on Social Security claiming strategies.
- Estate Planning: YFP Planning may include a review of a will, living will, power(s) of attorney, and/or recommendation of the need for a trust and related matters. The firm may coordinate the plan with the client's estate attorney.
- Miscellaneous: YFP Planning may educate and advise clients on various life events including funding a child's college education, purchase of a second home, or advice on a closely held business.

#### Foundational Financial Planning

- Overview: YFP Planning provides Foundational Financial Planning, which is designed for clients who are early to mid-career. It involves a client working directly with a financial planner, typically over a 2-year timeframe. The client receives continuous access to a financial planner who creates and maintains the client's financial plan and manages the client's investments. The plan is reviewed at least annually.
- Scope: Depending on the client's goals and balance sheet, Foundational Financial Planning may address some or all of the following:
  - Fundamentals
    - Account Aggregation and Net Worth: YFP Planning assists with the aggregation of client assets and liabilities to build a dynamic net worth statement.
    - Cash Flow: YFP Planning conducts a review of the client's income and expenses to determine the current surplus or deficit.
    - Debt Management: YFP Planning helps clients to inventory their student loans, determine the appropriate repayment strategy and to optimize that strategy. The firm may also make recommendations on other debts including, but not limited to, consumer, auto and mortgage.
    - Savings Plan: YFP Planning may recommend the appropriate cash reserves for emergencies and other goals.
  - Insurance & Employee Benefits
    - Risk Management: A risk management review includes an analysis of a client's exposure to major risks that could have a significant adverse impact on their finances, such as premature death, disability or property and casualty losses.

- Employee Benefits: YFP Planning reviews employee benefits to ensure the client optimizes what is available including, but not limited to, insurance coverage and retirement plan benefits.
- Investment Analysis & Management: This service may involve developing an asset allocation strategy to meet a client's financial goals and risk tolerance, providing information on investment vehicles and strategies. It may involve accounts held at YFP Planning's custodian or by an outside custodian. An example of this may be giving the client advice on their current 401(k) plan.
- Tax Planning Strategies: Advice may include ways to minimize current and future taxes as a part of the client's overall financial planning strategy.
- Retirement Planning: YFP Planning provides a retirement plan analysis by calculating the total amount needed in retirement. YFP Planning then discounts that sum back to present value (per month) and advises the client how to adjust their financial plan to meet their retirement goal.
- Estate Planning: YFP Planning may help gather information pertinent to determining the appropriate estate planning documents needed and work with an estate planning attorney to deliver those documents for the client to review and sign.
- Miscellaneous: YFP Planning may educate and advise clients on various life events including combining accounts for a newly married couple, home purchase, saving for a child's college education, help improve credit, and assistance with negotiating job offers or salary increases.

#### Investment Management

- Overview: YFP Planning advises clients on accounts managed by YFP Planning and accounts held by outside custodians. For purposes of this Form ADV, an outside custodian is defined as any financial institution other than TD Ameritrade Institutional (TDAI), Charles Schwab (Schwab) or Altruist that custodies the firm's client assets. YFP Managed Accounts are client accounts custodied at TD Ameritrade Institutional, Charles Schwab or Altruist. The plan is reviewed at least annually.
- Scope: Depending on the investment profile, the client may elect investment management via YFP Planning Managed Accounts. YFP Planning considers the client's income, net worth, tax objectives, investment objectives, time horizon, risk tolerance, age and investment experience.
  - Investment Management (YFP Planning Managed Accounts): For client accounts managed by YFP Planning, the firm prepares an investment policy statement (IPS). As part of the IPS, YFP Planning recommends an asset allocation strategy, providing information on investment vehicles and strategies. The IPS governs how the accounts will be managed by YFP Planning, including trading and rebalancing the client account. For additional information on the IPS, refer to Item 8.
  - Investment Management (Held-Away Accounts): YFP Planning provides an additional service for accounts held in an outside custodian. These are primarily 401(k), 403(b), TSP, HSA and 529 accounts that clients are actively contributing to.

### Retirement Plan Services for Small Business Owners

- Overview: This service provides employee retirement plan services to employer plan sponsors 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.
- Scope: As the needs of the plan sponsor dictate, areas of advising could include: investment options, plan structure and features selection, and participant education. In providing employee benefit plan services, YFP Planning does not provide any advisory services with respect to the following types of assets: employer securities, participant loans, non-publicly traded securities or assets, other illiquid investments, or brokerage window programs (collectively, "Excluded Assets"). All retirement plan consulting services shall be in compliance with the applicable state laws regulating retirement consulting services. This applies to client accounts that are retirement or other employee benefit plans ("Plan") governed by the Employee Retirement Income Security Act of 1974, as amended ("ERISA"). If the client accounts are part of a Plan, and our firm accepts appointments to provide services to such accounts, our firm acknowledges its fiduciary standard within the meaning of Section 3(21) of ERISA as designated by the Retirement Plan Consulting Agreement with respect to the provision of services described therein. YFP Planning will not include voting on proxies either while acting as the employer plan investment adviser or as an investment adviser to individual clients.

### Student Loan Analysis

- Overview: YFP Planning helps clients develop an optimal student loan repayment strategy. This service is included in Financial Planning.
- Scope: YFP Planning helps clients inventory their student loans to assess current loan balance, interest rate and loan status. In developing recommendations, YFP Planning reviews the client's current financial profile, their goals regarding the loans, the client's career trajectory and family situation. Following delivery of the recommendations, the firm advises clients how best to execute their strategy.

### Life Planning

- Overview: The service involves following the Kinder Method™ of Life Planning. This method allows YFP Planning to help clients cultivate a Life Plan in conjunction with their financial plan.
- Scope: YFP Planning takes clients through the EVOKE® Life Planning process. EVOKE is an acronym that stands for Exploration, Vision, Obstacles, Knowledge and Execution.

### Wrap Fee Programs

- YFP Planning does not participate in wrap fee programs.

## Item 5: Fees and Compensation

### Overview

Fees are either paid one-time or in an ongoing manner, depending upon services rendered. A one-time fee is charged to clients who do not require ongoing service. Conversely, a periodic fee is charged to clients who require ongoing service, such as for Wealth Management. No increase in the fee shall be effective without the client signing a new agreement or amendment to their current agreement.

The fee is paid by the client authorizing the firm to debit the client's bank account or investment account. For clients who pay via their bank account, an electronic payment processing system is used that encrypts the client's financial information. Upon payment, the client will receive an email receipt on the payment date. The client is encouraged to verify these email receipts with their bank statements.

After signing a client agreement, the client may terminate the client agreement within the first five business days and receive a full refund of any fees paid. Thereafter, either the client or YFP Planning may terminate the client agreement by providing 30 days written notification to the other party. Upon termination, any fees paid in advance by the client will be prorated, and any unearned fees refunded to the client. Please see details under Foundational Financial Planning for cancellation within one year of starting the engagement. Fees may be discounted at the sole discretion of YFP Planning and some legacy clients may pay a lower fee. Note: YFP Planning fees may be in excess of the industry norm. Similar advisory services can be obtained for less.

### Fees for Advisory Services

#### Wealth Management

Fees for Wealth Management include an initial planning fee, due at the start of the advisory relationship, plus an ongoing advisory fee, which is paid in advance in quarterly installments. The initial planning fee ranges from \$1,500 - \$2,500 based on complexity. The ongoing advisory fee is based on the account value of the assets under management (AUM) and is a blended calculation based on the following table:

Account Value	Annual Advisory Fee
Up to \$250,000	1.40%
\$250,001 - \$1,000,000	1.00%
\$1,000,001 - \$2,000,000	0.80%
\$2,000,001 - \$3,000,000	0.60%
\$3,000,001 and above	0.20%

For example, an account valued at \$2,500,000 would pay an effective fee of 0.88% with the annual fee of \$22,000, calculated as follows:



$$(\$250,000 \times 1.40\%) + (\$750,000 \times 1.00\%) + (\$1,000,000 \times 0.80\%) + (\$500,000 \times 0.60\%) = \$22,000$$

YFP Planning may charge additional fees based on the approximate value of held-away assets that are advised upon but not directly managed on a discretionary basis.

#### Foundational Financial Planning

Fees for Foundational Financial Planning include an initial planning fee, due at the start of the advisory relationship, plus an ongoing advisory fee, which is paid in advance in quarterly installments. The initial planning fee ranges from \$1,500 - \$2,500 and the ongoing advisory fee is a flat fee ranging from \$4,000 - \$10,000, based on, but not limited to, a clients' specific situation, the complexity of their needs, and the approximate value of held-away assets that are advised upon but not directly managed on a discretionary basis.

Due to the volume and intensity of work in the first year of this service, YFP Planning does not issue refunds if this service is canceled within the first year of engagement. Furthermore, YFP Planning bills the unpaid balance of the first year's fee if the service is canceled within the first year of engagement. For example, if the initial planning fee is \$1,500 and the annual fee is \$4,000, paid in \$1,000 quarterly installments, the total fee to be billed is \$5,500. The unpaid balance of that fee will be billed in full regardless at cancellation. The client will receive a copy of their draft plan at that time. Beyond the first year of the engagement, a 30-day notice is required and any unearned fee would be prorated and refunded to the client. The client may cancel within 5 days of signing the engagement for a full refund if YFP Planning has not met with the client or engaged in any planning services.

#### Investment Management

Fees for Investment Management include an initial planning fee, due at the start of the advisory relationship, plus an ongoing advisory fee, which is paid in advance in quarterly installments. The initial planning fee ranges from \$1,500 - \$2,500 based on complexity. The ongoing advisory fee is based on the account value of the assets under management (AUM) and is a blended calculation based on the following table:

<b>Account Value</b>	<b>Annual Advisory Fee</b>
Up to \$250,000	1.40%
\$250,001 - \$1,000,000	1.00%
\$1,000,001 - \$2,000,000	0.80%
\$2,000,001 - \$3,000,000	0.60%
\$3,000,001 and above	0.20%

For example, an account valued at \$750,000 would pay an effective fee of 1.13% with the annual fee of \$8,500, calculated as follows:

$$(\$250,000 \times 1.40\%) + (\$500,000 \times 1.00\%) = \$8,500$$

YFP Planning may charge additional fees based on the approximate value of held-away assets that are advised upon but not directly managed on a discretionary basis. We charge a minimum fee of \$600 per year for Investment Management.

#### Retirement Plan Services for Small Business Owners

Fees for Retirement Plan Services for Small Business Owners are determined by size and demographics of the plan, number of participants, types of investments requested by the plan trustee or plan administrator, and design of the plan. Fees include an initial planning fee, due at the start of the advisory relationship, plus an ongoing advisory fee based on a percentage of plan assets, not to exceed 0.50%. The initial planning fee ranges from \$1,500 - \$3,500.

#### Student Loan Analysis

Fees for the Student Loan Analysis is a fixed fee, paid in advance. Pricing is based on the number of borrowers in your household and your tax filing status (either Single - S, Married Filing Jointly - MFJ, or Married Filing Separately - MFS), as outlined in the table below:

<b>Client Status</b>	<b>Fee</b>
1 borrower filing S, MFJ, MFS	\$599
2 borrowers filing MFJ, MFS	\$799

#### Life Planning

Fees for Life Planning include a one-time fee of \$1,500 for an individual or \$2,500 for a couple, paid in advance.

#### Hourly Fees

Advisory services can also be offered at an hourly fee of \$299 per hour. The fee may be negotiable in certain cases and is due at the completion of the engagement. In the event of early termination by a client, any fees for the hours already worked will be due.

#### Other Types of Fees and Expenses

Our fees are exclusive of brokerage commissions, transaction fees and other related costs and expenses, which may be incurred by the client. Clients may incur certain charges imposed by custodians, brokers and other third parties such as custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees and other fees and taxes on brokerage accounts and securities transactions. Mutual fund and exchange-traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to

our fee, and we shall not receive any portion of these commissions, fees, and costs. YFP Planning does not accept compensation for the sale of securities or other investment products including asset-based sales charges or service fees from the sale of mutual funds. Please see Item 12 for further information on services provided by brokers that may be used by YFP Planning.

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

YFP Planning does not offer performance-based fees.

## Item 7: Types of Clients

YFP Planning's clients include individuals, high net worth individuals, families, and business entities. The firm does not have a minimum account size requirement.

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

TDAI, Schwab and Altruist regularly provide YFP Planning with information about their products and services. TDAI and Schwab also provide YFP Planning with research and data on public companies, which is taken into consideration when making recommendations to clients.

YFP Planning primarily practices passive investment management. Passive investing involves building portfolios composed of distinct asset classes. The asset classes are weighted in a manner to achieve a desired relationship between correlation, risk and return. Funds that passively capture the returns of the desired asset classes are placed in the portfolio. The funds that are used to build passive portfolios are typically index mutual funds or exchange traded funds. Passive investment management is characterized by low portfolio expenses (i.e. the funds inside the portfolio have low internal costs), minimal trading costs (due to infrequent trading activity) and relative tax efficiency (because the funds inside the portfolio are tax efficient and turnover inside the portfolio is minimal).

Active management involves a single manager or managers who employ some method, strategy or technique to construct a portfolio that is intended to generate returns that are greater than the broader market or a designated benchmark. Accounts of clients who choose to pursue an active management approach, may be subject to increased trading costs and market volatility.

Investing in securities involves risk of loss that clients should be prepared to bear. The following risks are associated with both passive and active investment management strategies:

- **Market Risk:** Market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the value of the investment regardless of the operational success of the issuer's operations or its financial condition.
- **Strategy Risk:** The Adviser's investment strategies and/or investment techniques may not work as intended.
- **Small and Medium Cap Company Risk:** Securities of companies with small and medium market capitalizations are often more volatile and less liquid than investments in larger companies. Small and medium cap companies may face a greater risk of business failure, which could increase the volatility of the client's portfolio.
- **Turnover Risk:** At times, the strategy may have a portfolio turnover rate that is higher than other strategies. A high portfolio turnover would result in correspondingly greater brokerage commission expenses and may result in the distribution of additional capital gains for tax purposes. These factors may negatively affect the account's performance.
- **Limited Markets:** Certain securities may be less liquid (harder to sell or buy) and their prices may at times be more volatile than at other times. Under certain market conditions, we may be unable to sell or liquidate investments at prices we consider reasonable or favorable, or find buyers at any price.
- **Concentration Risk:** Certain investment strategies focus on particular asset-classes, industries, sectors or types of investment. From time to time these strategies may be subject to greater risks of adverse developments in such areas of focus than a strategy that is more broadly diversified across a wider variety of investments.
- **Interest Rate Risk:** Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true: bond prices generally rise when interest rates fall. In general, fixed income securities with longer maturities are more sensitive to these price changes. Most other investments are also sensitive to the level and direction of interest rates.
- **Legal or Legislative Risk:** Legislative changes or court rulings may impact the value of investments, or the securities' claim on the issuer's assets and finances.
- **Inflation:** Inflation may erode the buying power of your investment portfolio, even if the dollar value of your investments remains the same.

In order to develop the client's IPS, YFP Planning considers the client's income, net worth, tax objectives, investment objectives, time horizon, risk tolerance, age and investment experience. A questionnaire aids in our assessment of the client's stated investment objectives and risk tolerance. Ultimately, the IPS governs how the accounts custodied will be managed by YFP Planning. The IPS outlines proposed versus current (if applicable) holdings, a breakdown of the asset allocation, portfolio performance and risk information, including past performance for historical scenarios (stress test) and fund expense.

## Item 9: Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to the client's evaluation of YFP Planning or the integrity of the firm's management. Neither YFP Planning nor any of its financial professionals have been the subject of any customer complaints, arbitrations, civil lawsuits, or disciplinary proceedings by the SEC or any state securities division or agency.

## Item 10: Other Financial Industry Activities and Affiliations

### **Relationship with Your Financial Pharmacist (YFP)**

No YFP employee is registered, or has an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

No YFP employee is registered, or has an application pending to register, as a futures commission merchant, commodity pool operator or a commodity trading advisor.

YFP Planning is a wholly owned subsidiary of YFP, which offers education about general financial topics through podcasts, articles, and other media. Timothy Ulbrich, PharmD and Timothy Baker, CFP® are principals of YFP and, as such, receive compensation from YFP. The following are ways YFP generates revenue:

- Book sales from general public and clients of YFP Planning
- Affiliate revenue from general public
- Advertising on blog, website, podcast from strategic partners
- Speaking fees from strategic partners

YFP Planning generates revenue strictly from fees charged for advisory services to clients. YFP community members may or may not be clients of YFP Planning, and community members are under no obligation whatsoever to use any service offered by YFP Planning. Clients of YFP Planning are under no obligation whatsoever to use any service offered by YFP. To avoid any potential conflicts of interest, clients of YFP Planning agree, for the duration of this Agreement is in effect, not to use any YFP affiliate links (i.e., student loan refinance offers) in which YFP receives compensation.

### **Relationship with YFP Tax**

YFP Planning is under common control with YFP Tax, LLC, a tax preparation firm located in the same place of business as YFP Planning. YFP Planning does not render tax preparation services to our clients, however, YFP Tax does offer tax preparation services. To the extent that a client requires tax preparation services, we, if requested, may recommend the services of an accounting or tax preparation firm,

including YFP Tax. These tax preparation services shall be rendered independent of YFP Planning pursuant to a separate agreement between the client and the tax preparation firm.

#### **Recommendations or Selections of Other Advisers**

YFP Planning does not recommend or select other investment advisers for clients and does not receive compensation from any other advisers.

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

YFP Planning has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct and fiduciary duty to its clients. The Code of Ethics includes provisions relating to our professional duties to our clients, standards of conduct, and personal trading policy. The Code of Ethics is available to clients upon request.

The firm also adheres to the Code of Ethics and Standards of Conduct adopted by the CFP Board of Standards Inc., and accepts the obligation not only to comply with the mandates and requirements of all applicable laws and regulations but also to take responsibility to act in an ethical and professionally responsible manner in all professional services and activities. YFP Planning will provide clients with a copy of the firm's Code of Ethics if requested.

#### **Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest**

A recommendation made to one client may be different in nature or in timing from a recommendation made to a different client. Clients often have different objectives and risk tolerances. At no time, however, will the firm or any related persons receive preferential treatment over clients.

#### **Trading Securities At/Around the Same Time as Client's Securities**

The firm, its financial professionals and their family members may buy or sell securities the same as, similar to, or different from, those recommended to clients for their accounts. YFP Planning will not trade non-mutual fund securities five days prior to the same security for clients.

In an effort to reduce or eliminate certain conflicts of interest involving the firm or personal trading, YFP Planning's policy may require that we restrict or prohibit the firm's financial professionals' transactions in specific reportable securities transactions. Any exceptions or trading pre-clearance must be approved by the firm principal in advance of the transaction in an account, and YFP Planning maintains the required personal securities transaction records per regulation.

## Item 12: Brokerage Practices

YFP Planning generally recommends that clients engage the brokerage and custodial services of TD Ameritrade Institutional (“TDA”), Charles Schwab Institutional, and/or Altruist Financial LLC (each a “Custodian”). We recommend these Custodians because we believe that they provide our clients with expedient, efficient, and low-cost trade processing. We recommend the Custodians to clients based upon our view of their integrity and financial responsibility and in pursuit of the best execution of orders for client accounts. We never require our clients to utilize any particular custodian or broker-dealer in order to engage our services. Clients are free to use the custodian of their choosing, whether recommended by us or not.

If the client selects a broker-dealer other than those recommended by our firm (i.e., directed brokerage), you are advised that we may be unable to seek best execution of transactions for your account and your commission costs may be higher than those experienced by clients who have engaged one of our recommended Custodians. For example, in a directed brokerage account, you may pay higher brokerage commissions and/or receive less favorable prices on the underlying securities purchased or sold for your account. In addition, where you direct brokerage, we may place orders for your transactions after we place transactions for clients using our recommended Custodians. We reserve the right to reject your request to use a particular broker-dealer if such selection would frustrate our management of your account, or for any other reason.

### **Factors Used to Select Custodians and/or Broker-Dealers**

We seek to use a custodian/broker that will hold your assets and execute transactions on terms that are overall most advantageous when compared with other available providers and their services. We consider a wide range of factors, including:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody)
- Capability to execute, clear, and settle trades (buy and sell securities for your account)
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded 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 the prices
- Reputation, financial strength, security and stability
- Prior service to us and our clients

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

YFP Planning currently does not receive soft dollar benefits.

**Brokerage for Client Referrals**

YFP Planning receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

**The Custodian and Brokers We Use (TD Ameritrade Institutional)**

YFP Planning participates in the TDAI program. TDAI is a division of TD Ameritrade, Inc. ("TD Ameritrade"), member FINRA/SIPC. TD Ameritrade is an independent and unaffiliated SEC-registered broker-dealer. TD Ameritrade offers to independent investment advisers services which include custody of securities, trade execution, clearance, and settlement of transactions. YFP Planning receives some benefits from TD Ameritrade through its participation in the program (please see the disclosure under Item 14 below).

**The Custodian and Brokers We Use (Schwab & Co., Inc.)**

YFP Planning does not maintain custody of your assets that we manage/on which we advise, although we may be deemed to have custody of your assets if you give us authority to withdraw assets from your account. Your assets must be maintained in an account at a "qualified custodian," generally a broker-dealer or bank. We sometimes recommend that our clients use Charles Schwab & Co., Inc. ("Schwab"), a registered broker-dealer, member SIPC, as the qualified custodian. We are independently owned and operated and are not affiliated with Schwab. Schwab will hold your assets in a brokerage account and buy and sell securities when we instruct them to. While we sometimes recommend that you use Schwab as custodian/ broker, you will decide whether to do so and will open your account with Schwab by entering into an account agreement directly with them. We do not open the account for you, although we may assist you in doing so. Even though your account is maintained at Schwab, we can still use other brokers to execute trades for your account as described below (see "Your brokerage and custody costs").

**The Custodian and Brokers We Use (Altruist Financial LLC)**

For the benefit of no commissions or transaction fees, fully digital account opening, a large variety of security options and complete integration with software tools, YFP Planning recommends Altruist Financial LLC ("Altruist"), an unaffiliated SEC-registered broker dealer and FINRA/SIPC member, as the introducing broker to Apex Clearing Corporation, an unaffiliated SEC-registered broker dealer and FINRA/SIPC member, as the clients' custodian. YFP Planning does not receive any research or other soft-dollar benefit by nature from its relationship with Altruist, nor does YFP Planning receive any referrals in exchange for using Altruist as a broker dealer.

**Aggregating (Block) Trading for Multiple Client Accounts**

Generally, the firm combines multiple orders for shares of the same securities purchased for advisory accounts YFP Planning manages (this practice is commonly referred to as "block trading"). YFP Planning will then distribute a portion of the shares to participating accounts in a fair and equitable manner. The distribution of the shares purchased is typically proportionate to the size of the account, but it is not based on account performance or the amount or structure of management fees. Subject to our sole



discretion, taking into consideration particular circumstances and market conditions, when the firm combines orders, each participating account pays an average price per share for all transactions and pays a proportionate share of all transaction costs. Accounts owned by the firm or persons associated with the firm may participate in block trading with client accounts, however, they will not be given preferential treatment.

## Item 13: Review of Accounts

YFP Planning Managed Accounts are reviewed by the designated YFP Planning financial professional, on at least an annual basis. Typically, the review consists of rebalancing the portfolio to reset the allocation back to the agreed upon recommendation as outlined in the client's IPS.

YFP Planning financial professionals meet with each client no less than annually to conduct an annual review of their financial plan and/or investment account. During this review, YFP Planning financial professionals revisit the client's investment objectives, current and future needs, anticipated life cycle changes, the portfolio performance, and specific investment performance. During these meetings, the designated YFP Planning financial professional may make recommendations deemed appropriate.

Clients receive trade confirmations from their custodian for each transaction in their accounts as well as monthly or quarterly statements and annual tax reporting statements from their custodian showing all activity in the accounts, such as receipt of dividends and interest.

## Item 14: Client Referrals and Other Compensation

No one at YFP Planning receives any economic benefit, directly or indirectly, from any third party for advice rendered to clients. As disclosed in Item 10, YFP Planning is a wholly owned subsidiary of YFP. YFP generates revenue unrelated to the advisory services and fees charged to clients by YFP Planning.

As disclosed under Item 12, above, YFP Planning participates in TD Ameritrade's institutional customer program and YFP Planning recommends TD Ameritrade to clients for custody and brokerage services. There is no direct link between YFP Planning's participation in the program and the investment advice it gives to clients, although YFP Planning receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate client statements and confirmations, research related products and tools, consulting services, access to a trading desk serving YFP Planning clients, access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts), the ability to have advisory fees deducted directly from client accounts, access to an electronic communications network for client order entry and account information, access to mutual funds with no transaction fees and to certain institutional money managers, and discounts on compliance, marketing, research, technology, and practice management products or services provided to YFP Planning by third

party vendors. Some of the products and services made available by TD Ameritrade through the program are designed to benefit YFP Planning but may not benefit its client accounts. These products or services are designed to assist YFP Planning in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help the firm manage and further develop its business enterprise. The benefits received by YFP Planning or its personnel through participation in the program do not depend on the number of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, YFP Planning endeavors at all times to put the interests of clients first. Clients should be aware, however, that the receipt of economic benefits by YFP Planning or its related persons in and of itself creates a conflict of interest and may indirectly influence the firm's choice of TD Ameritrade for custody and brokerage services.

## Item 15: Custody

For YFP Planning Managed Accounts, the firm does not have physical custody of client funds. YFP Planning may, however, withdraw its advisory fees either from the client's investment advisory account or from the client's bank account, as determined by the client. The custodian sends quarterly statements to the client showing all disbursements for the custodian account, including the amount of the advisory fees. Clients provide written authorization permitting YFP Planning to be paid directly for their accounts held by the custodian or trustee.

## Item 16: Investment Discretion

For YFP Planning Managed Accounts, the firm maintains discretion over client accounts with respect to securities to be bought and sold, and the amount of securities to be bought and sold. At the start of the advisory relationship, the client executes a Limited Power of Attorney, which grants the firm discretion over the account.

## Item 17: Voting Client Securities

YFP Planning does not vote on client proxies.

## Item 18: Financial Information

YFP Planning does not have any financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and the firm has not been the subject of a bankruptcy proceeding.

## Item 19: Requirements for State-Registered Advisers

Not applicable.