

Item 1: Cover Page

The Planner's Edge LLC

Form ADV Part 2A Brochure

The Planner's Edge LLC
2737 78th Avenue, SE, Suite 103
Mercer Island, WA 98040
Telephone: 206-232-4500
E-mail: jeff@jeffreyross.com
Website: www.theplannersedge.com

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This Form ADV Part 2A brochure provides information about the qualifications and business practices of The Planner's Edge LLC. If you have any questions about the contents of this brochure, please contact us at 206-232-4500 or info@theplannersedge.com. 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 The Planner's Edge LLC also is available on the SEC's website at www.adviserinfo.sec.gov. The Planner's Edge LLC is a registered investment advisor and our CRD number is 114616. Registration as an investment advisor does not imply any certain level of skill or training.

Item 2: Material Changes

We are required to provide all material changes made to our ADV Part 2A (“brochure”) since our last annual update. Since our last annual update in February 2021, we have not made any material changes to our brochure:

We have made non-material changes to help clarify or provide additional detail. We transitioned to SEC registration from state registration in April 2021 and removed references to and required narrative of our former primary regulator. We encourage you to read our brochure in its entirety.

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Item 4: Types of Advisory Services

The Planner's Edge LLC is referred to in this document as "The Planner's Edge®," "the Company," "us," "we," or "our." In this document we refer to current and prospective clients of The Planner's Edge® as "you," "client," or "your." The Planner's Edge® was created in 2017, and registered as an investment advisor in 2018. The Company continued the advisory business previously conducted by Jeffrey Ross as a sole proprietor since 1990. We offer customized advisory services, including financial planning and portfolio management. Our services are described in more detail below. Specific services and fees are detailed to clients in a written agreement prior to any services being provided.

The Serious Money Approach™

The Planner's Edge® has created a set of customized advisory services we call The Serious Money Approach™. The components of The Serious Money Approach™ include:

Serious Money Conversations—for helping you focus on your life (including your clarity, your confidence, your progress, your dangers, and your opportunities).

Serious Money Thinking Systems—for helping you think about your dangers and opportunities correctly (including Serious Money Career Lessons™, Serious Money Career Principles™, Serious Money Career Strategies™, and The Serious Money Vision Map™)

Serious Money Strategy Management—for helping you keep your strategies on track continuously (including design of The Serious Money GamePlan™, implementation, information, communication, documentation, and reporting)

Serious Money Portfolio Management—for helping you manage your serious money seriously (including 3 Principles, 3 Practices, 8 Big Mistakes to Avoid, Lifestyle Strategies, and Serious Money Managers)

Serious Money-in-Motion Management—for helping you know where all of your money is all of the time (including posting investment transactions, deposits and withdrawals; establishing and monitoring targets; and delivering personalized reports)

Serious Money Paperwork Management—for helping you retain and secure relevant documents (including preparation, processing, follow up, scanning, and retention)

Portfolio Management Services

The Planner's Edge LLC® provides portfolio management services on a continuous and ongoing basis guided by the individual needs of the client. Using the information provided by you, we provide investment advice and recommendations tailored to your individual situation. We implement recommendations on a discretionary basis upon your written authorization. We regularly inquire about, and you are responsible for providing, information about your investment goals, time horizon, and risk tolerance.

Clients who contract for portfolio management services pay a monthly management fee, in arrears, that includes all of the customized advisory services, as appropriate to your individual circumstances, that are part of the Serious Money Approach.

Clients who contract for portfolio management services receive:

- The Serious Money Portfolio Snapshot™, a one-page performance report (delivered periodically);
- Serious Money Talks™, a monthly newsletter containing general investment principles and opinions;
- Portfolio Average Daily Balance (ADB) Report, containing the balances of your accounts and the step-by-step calculation of your monthly fee.

Clients typically contract for portfolio management services but are able to contract for individual components of The Serious Money Approach separate from portfolio management services and will pay an hourly or flat rate fee.

Financial Planning

Some clients are provided a written plan, referred to as a Gameplan Overview or Serious Money Vision Map, that may include a personal balance sheet and certain projections.

The financial plans we provide do not usually address all potential aspects of financial planning. Typically, our plans address retirement planning, college funding, estate planning, and investment strategies. Risk management issues such as life, health, disability, and long-term care insurance are not typically addressed, and you are encouraged to seek professional counsel in these areas.

Upon request and as agreed to in our written Letter of Engagement we will provide portfolio monitoring and reporting services for assets held outside of The Planner's Edge LLC®. This includes performance reporting of aggregated holdings from different custodians where a client's assets are held. This service is dependent on our ability to receive a feed of such assets and is customized for the specific client on a case-by-case basis.

Types of Investments Used

We consider different types of securities when formulating the investment advice we give to you, including publicly traded individual stocks and bonds, mutual funds, and exchange traded funds. If you come to us with existing privately held investments, we evaluate them with respect to your financial goals, risk tolerance, and investment time horizon.

Tailored Services and Investment Restrictions

We attempt to tailor your investment portfolio to your situation as you have described it to us. This is why it is so important that you let us know about changes to your financial situation, goals, or investment time horizon. You may impose restrictions on investing in certain securities or types of securities. You must clearly identify these restrictions in writing to us.

Assets Under Management

As of December 31, 2020, The Planner's Edge® had approximately \$127,147,487 of client assets under management, all on a discretionary basis.

Item 5: Fees and Compensation

Compensation Methodology and Rates

Clients may contract for individual components of The Serious Money Approach™ for a flat fee determined in advance. Fees typically range between \$1500 and \$2500, based on the number of components desired and the complexity of the client's individual circumstances. The first half of the fee is due before or during the first consultation and the second half of the fee is due at the conclusion of the initial planning consultation. The specific engagement and fees will be detailed in a signed Letter of Engagement.

Portfolio Management Services

We typically charge an asset-based fee for our portfolio management services. This fee is based on a percentage of the assets under our management. Your specific annual fee arrangement will be described in the written Letter of Engagement entered into between The Planner's Edge and you. Fees are negotiable at our sole discretion. All clients do not pay the same fee.

Our asset-based fee is billed monthly, in arrears, based on the average daily balance of the account for the month. If the Letter of Engagement does not span the entire monthly billing period, the fee will be pro-rated based on the number of days the account is open during the billing period. Your account custodian will send client statements, at least quarterly, showing all disbursements for the account including the amount of the advisory fee, if deducted directly from the account. We encourage you to verify the accuracy of the fee calculation as the account custodian will not determine whether the fee has been properly calculated. See Item 12: Brokerage Practices in this brochure for more information about your account custodian(s).

The following is our maximum annual asset-based fee schedule for portfolio management services. Your specific annual fee arrangement will be described in the written Letter of Engagement entered into between The Planner's Edge and you.

1.50% of the first	\$100,000, plus
1.25% of the next	\$150,000, plus
1.00% of the next	\$250,000, plus
0.85% of the next	\$500,000, plus
0.75% of the next	\$1,500,000, plus
0.65% of the next	\$2,500,000, plus
0.55% of the next	\$5,000,000, plus
0.45% of the next	\$15,000,000, plus
0.30% of the next	\$25,000,000, plus
0.20% of amounts above	\$50,000,000

We calculate your monthly asset-based fee by taking the total annual fee equivalent based on the average daily balance for the previous month, as provided by your account custodian, multiplying by the number of days in the month and dividing by 365.

You may enter into a Letter of Engagement with us where a fixed fee for portfolio management services is determined through negotiations and agreement between you and The Planner's Edge®. Fixed fees are not necessarily based upon the value of assets managed or time expended providing services. Fixed fees are normally agreed to for one year, then renegotiated and agreed to for future periods. If you are paying a fixed fee you may pay a fee higher or lower than one based upon the value of assets managed. Fixed fees will be billed in arrears.

We offer an annual fixed fee option, billed monthly in arrears, for our portfolio monitoring and reporting services as well as our ongoing portfolio management services.

Hourly Fees

We will provide advisory services for you based upon the amount of time to complete the service times an hourly rate. The rate per hour depends upon the level of complexity of the service and experience and expertise of the personnel used to do the work. This negotiable rate is normally \$300 per hour. The tasks and services to be performed are described in a Letter of Engagement letter that is signed by you and The Planner's Edge® that also includes the hourly rate, an estimate of time to complete the project, and the procedure for refund or partial billing if the Engagement is terminated before completion.

How Clients Pay Advisory Fees

Portfolio management fees are typically deducted directly from your account pursuant to your written Letter of Engagement and your written authorization to your qualified account custodian. Fixed rate fees may be deducted direct from your account, as applicable and authorized in writing, or paid via check or electronic funds transfer.

Termination of Services

Either party may terminate services by submitting written notice to all appropriate parties.

If notice is received within five business days of executing the client Letter of Engagement, services will be terminated without penalty.

If we collect any fees in advance of services being performed, these will be returned to you at time of termination on a pro rata basis based upon the number of days the account was with our firm, or the portion of the project completed in relation to the total agreed upon project. Any fixed rate Engagement will remain in effect until completion of individual components contracted for no later than six months from signing.

Other Types of Fees and Expenses

In addition to the investment advisory fees you pay to us, you will pay fees to third-parties such as transaction and administrative fees to your custodian or broker-dealer. Examples of some of these fees include:

- Transaction fees to buy and sell securities
- periodic distribution fees
- electronic fund and wire transfer fees
- certificate delivery fees
- reorganization fees
- account transfer fees (outbound)
- returned check fees
- international security transfer fees
- overnight mail and check fees
- Rule 144 transfer fees
- transfer agent fees

The Planner's Edge® does not receive any part of these fees. This list is not meant to be all inclusive. Any fee on a special service incurred by the client will be fully disclosed. Please refer to Item 12: Brokerage Practices of this brochure for more details about brokerage practices.

Investment Company Fees

Investment company funds (e.g., mutual funds and ETFs) that are held by you will bear their own internal transaction and execution costs, as well as directly compensate their investment managers along with internal administrative services. Some funds pay 12b-1 fees, distribution fees, and/or shareholder service fees to broker-dealers that offer investment company funds to their clients. These fees affect the net asset value of the fund shares and are indirectly borne by fund shareholders such as you. Our policy is to only purchase no-load funds, which we believe lessens the overall cost to clients. The Planner's Edge does not receive any part of these fees.

Commission Based Compensation

Neither The Planner's Edge® nor Jeffrey Ross receives any commission-based compensation from the sale of securities while providing investment advisory services to you.

Additional Compensation

Neither The Planner's Edge® nor Jeffrey Ross receives additional compensation outside of The Planner's Edge®.

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

The Planner's Edge® does not charge fees that are based upon a share of capital gains or capital appreciation of client assets. We provide investment advisory services to other

clients in addition to you. Not all clients receive the same investment advice, nor do they pay the same fee. We strive to act in the best interests of each of our clients at all times.

Item 7: Types of Clients

The Planner's Edge® provides advisory services to a variety of types of clients including individuals and trusts. We do not have a required minimum account size for our client's accounts. Some investments such as mutual funds may have minimum investment amounts. We reserve the right to not accept or terminate any client at any time.

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

Methods of Analysis

Investment Principles

Part of our analytical approach is adhere to three key Principles: Faith in the Future, Patience, and Discipline. By Faith in the Future we mean a long-term, enduring belief that troublesome economic and political conditions will successfully work out, even though we do not understand *how* they will work out. By Patience we again mean a long-term, enduring belief that troublesome economic and political conditions will successfully work out, even though we do not know *when* they will work out. By Discipline we mean doing things that have historically worked instead of trying things that have rarely or never worked.

Fundamental

Part of our analytical approach with mutual funds we consider to be fundamental: (a) meet personally with the manager, where appropriate; (b) understand the manager's discipline and strategy; and (c) analyze the manager's track record relative to its peer group over time.

Technical

Part of our analytical approach uses a method called Technical Analysis. Technical Analysis is a security analysis method with the goal of forecasting the direction of prices of securities or market indexes, through the study of past market data, primarily price and volume. We use market indicators to help assess whether an asset's price is trending in a particular direction, and if it is, the probability of its direction and of continuation. We also use research materials prepared by others.

Investment Strategies

Asset Allocation, Diversification and Rebalancing

Our investment strategy attempts to follow three practices: The first practice is Asset Allocation, which is an initial and continuing apportionment of your assets between asset classes that will best help you achieve your objectives. The second practice is Diversification, which is an initial and continuing apportionment of your assets across various sectors of the economy such that your portfolio will not be unduly over-weighted or under-weighted in one or more sectors. The third practice is Rebalancing, which is a

continuing process of occasionally shifting dollars in your portfolio from assets that have over-performed to assets that have under-performed.

Risks

General Risks to Investing

Investing is not without risk and involves the risk of loss of principal which you should be prepared to bear. We use strategies to try to reduce risk, including diversifying a portfolio across multiple asset classes, rebalancing assets when positions become significantly over-weighted, and harvesting profits when portfolio values reach pre-designated targets.

Despite these strategies, historical evidence clearly shows that every asset class has experienced severe declines in value—sometimes sustained over many years— throughout several periods of time in history. In addition, each of our strategies to minimize risk may not achieve that goal and pre-designated target levels may not be attained.

Frequent trading can affect investment performance several ways, including: (i) generating excessive trading commissions; (ii) experiencing holding periods of less than 12 months that lead to gains taxed at higher, earned-income tax rates rather than at lower, capital gains tax rates, and (iii) limiting the ability of a security to record multiple years of compounding, which is an important element to achieving favorable long-term portfolio returns.

As with any investment, you could lose all or part of your investments managed by The Planner's Edge®, and your account's performance could trail that of other investments.

Asset Class Risk

Securities in your portfolio(s) or in underlying investments such as mutual funds may underperform in comparison to the general securities markets or other asset classes.

Concentration Risk

To the extent that The Planner's Edge® recommends portfolio allocations that are concentrated in a particular market, industry or asset class, your portfolio may be susceptible to loss due to adverse occurrences affecting that market, industry, or asset class.

Equity Securities Risk

Equity securities are subject to changes in value that may be attributable to market perception of a particular issuer or general stock market fluctuations that affect all issuers. Investments in equity securities may be more volatile than other types of investments.

Growth Securities Risk

Growth companies are companies whose earnings growth potential appears to be greater than the market, in general, and whose revenue growth is expected to continue over an extended period. Stocks of growth companies or "growth securities" have market values that may be more volatile than those of other types of investments. Growth securities typically do not pay a dividend.

Issuer Risk

Your account's performance depends on the performance of individual securities in which your account invests. Any issuer may perform poorly, causing the value of its securities to decline. Poor performance may be caused by poor management decisions, competitive pressures, changes in technology, disruptions in supply, labor problems or shortages, corporate restructurings, fraudulent disclosures, or other factors. Changes to the financial condition or credit rating of an issuer of those securities may cause the value of the securities to decline.

Management Risk

The performance of your account is subject to the risk that our investment management strategy may not produce the intended results.

Market Risk

Your account could lose money over short periods due to short-term market movements and over longer periods during market downturns. The value of a security may decline due to general market conditions, economic trends, or events that are not specifically related to the issuer of the security or to factors that affect a particular industry or industries. During a general downturn in the securities markets, multiple asset classes may be negatively affected.

Market Trading Risks

Your investment account faces numerous market trading risks, including the potential lack of an active market for investments held in your account and losses from trading in secondary markets.

Passive Investment Risk

The Planner's Edge® may at times use a passive investment strategy where we do not attempt to take defensive positions in declining markets.

Larger Company Securities Risk

Securities of companies with larger market capitalizations may underperform securities of companies with smaller and mid-sized market capitalizations in certain economic environments. Larger, more established companies might be unable to react as quickly to new competitive challenges, such as changes in technology and consumer tastes. Some larger companies may be unable to grow at rates higher than the fastest growing smaller companies, especially during extended periods of economic expansion.

Liquidity Risk

A security may not be able to be sold at the time desired without adversely affecting the price.

Regulatory Risk

Changes in government regulations may adversely affect the value of a security. An insufficiently regulated industry or market might also permit inappropriate practices that adversely affect an investment.

Smaller Company Securities Risk

Securities of companies with smaller market capitalizations historically, tend to be more volatile and less liquid than larger company stocks. Smaller companies may have no or relatively short operating histories, or be newly public companies. Some of these companies have aggressive capital structures, including high debt levels, or are involved in rapidly growing or changing industries, or new technologies, which pose additional risks.

Value Style Investment Risk

Value stocks can perform differently from the market as a whole and from other types of stocks. Value stocks may be purchased based upon the belief that a given security may be out of favor. Value investing seeks to identify stocks that have depressed valuations, based upon a number of factors which are thought to be temporary in nature, and to sell them at superior profits when the issues which caused the valuation of the stock to be depressed are resolved. While certain value stocks may increase in value more quickly during periods of anticipated economic upturn, they may also lose value more quickly in periods of anticipated economic downturn. Furthermore, there is a risk that the factors which caused the depressed valuations are longer term or even permanent in nature, and that there will not be any rise in value. Finally, there is the increased risk that such companies may not have sufficient resources to continue as ongoing businesses, which may result in the stock of such companies becoming worthless.

Item 9: Disciplinary Information

Neither The Planner's Edge® nor Jeffrey Ross has been involved in any civil or criminal investment-related events.

Item 10: Other Financial Industry Activities and Affiliations

Neither The Planner's Edge® nor Jeffrey Ross is engaged in any other financial industry activities or affiliations.

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

Code of Ethics

We have adopted a code of ethics designed to prevent and detect violations of securities rules by our employees and affiliated persons. Our controls in this area focus upon securities transactions made by our employees that have access to material information about the trading of The Planner's Edge®. We will provide a copy of our code of ethics to clients or prospective clients upon request.

Material Financial Interest and Personal Trading

From time-to-time the interests of the The Planner's Edge® and/or Jeffrey Ross may coincide with yours and other clients. Individual securities may be bought, held, or sold by Jeffrey Ross that is-are also recommended to or held by you or another client. If potential

insider information is inadvertently provided or learned by a principal or employee, it is our policy to strictly prohibit its use.

It is the policy of The Planner's Edge® to permit the firm and its employees to buy, sell, and hold the same securities that we also recommend to clients. It is acknowledged and understood that we perform investment services for different types of clients with varying investment goals, risk profiles, and time horizons. As such, the investment advice offered to you may differ from other clients and investments made by us. We have no obligation to recommend for purchase or sale a security that The Planner's Edge®, its principals, affiliates, employees, sell, or hold. When a decision is made to liquidate a security from all applicable accounts, priority will always be given to client orders before those of a related or associated person to The Planner's Edge®. In some cases, the trades of the clients and advisory personnel will be combined in a single block trade, and all trades will receive the average price. We have procedures for dealing with insider trading, employee-related accounts, "front running" and other issues that may present a potential conflict when buy/sell recommendations are made. These procedures include reviewing employee security transactions and holdings to eliminate, to the extent possible, the adverse effects of potential conflicts of interest on clients.

Item 12: Brokerage Practices

Factors Considered When Recommending Broker-Dealers

We recommend that clients use a particular qualified custodian and/or broker-dealer. When we make this recommendation, we consider:

- reasonableness of transaction costs, services fees, and other brokerage and custodial account and activity fees
- ability to facilitate trades
- access to client records
- computer trading support
- other operational considerations

These factors are reviewed from time to time to assure the best interests of our clients are upheld.

Research and Other Benefits

We generally recommend that clients establish brokerage accounts with a specific custodian, TD AMERITRADE Institutional, a division of TD AMERITRADE, Inc., ("the Custodian"), a registered broker-dealer, to maintain custody of clients' assets and to execute trades for your account(s). The Custodian provides us with access to its institutional trading and operations services, which are typically not available to retail investors. These services are offered to independent investment advisors at no charge in exchange for keeping a minimum amount of account assets at the Custodian. The Custodian's services include research, brokerage, and custody. The Custodian offers access to mutual funds and other investments that are available only to institutional investors or require a significantly higher minimum investment. The Custodian also makes other

products and services available that benefit us but may not benefit our clients. Some of these other products and services help us manage and administer client accounts, and include software and other technology that:

- provide access to client account data (such as trade confirmations and account statements)
- facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts)
- provide research, pricing information, and other market data
- facilitate payment of our fees from your account(s)
- help with back-office support, recordkeeping, and client reporting

These services may be used with all or a substantial number of clients' accounts, including accounts not maintained at the Custodian. We do not attempt to allocate the benefit to accounts proportionately to the accounts that generate the benefit.

These business management and development services, in addition to those listed above, may include consulting, publications and presentations on practice management, information technology, business succession, regulatory compliance, and marketing. In addition, the Custodian may use independent third parties to offer these services to The Planner's Edge®. The Custodian may discount or waive fees it would otherwise charge for some of these business management and development services or pay all or a part of the fees of a third-party providing these services to us. Because we receive discounts, research, products, or services we may have an incentive to select or recommend a broker-dealer based on our interest in receiving the research, products, or services, rather than on the client's interest in receiving most favorable execution. The Custodian or broker-dealer recommended by The Planner's Edge® may charge commissions (or markups or markdowns) higher than those charged by other broker-dealers in return for services and benefits.

Brokerage for Client Referrals

The Planner's Edge® does not have any agreements in place where securities transactions are directed to particular broker-dealers in exchange for client referrals.

Trade Errors

Your account Custodian will be contacted immediately about any trade error. Trading errors are usually corrected after the trade settles and may take five to seven business days to finalize.

If The Planner's Edge® is responsible for making a trade error in a client's account the error will be corrected, and the client's account will be restored to where it would have been had the trade error not occurred. Any profit from the trade correction will be retained by your account Custodian. Neither clients nor The Planner's Edge® will retain the profit from a trade correction.

Item 13: Review of Accounts

Reviews

The Planner's Edge® reviews the securities held in its clients' investment supervisory accounts on an ongoing basis. The reviews are conducted by Jeffrey Ross or other staff members. Portfolios are usually reviewed weekly against pre-designated target levels. We strive to meet with you at least annually to review your accounts for proper asset allocation and to assure they remain in-line with your investment objectives.

Reviews may also be triggered by changes in a client's personal, tax, or financial status. Macroeconomic and company-specific events may also trigger reviews.

Financial plans are reviewed only upon request and/or during client review consultations.

Reports

The Planner's Edge® prepares and distributes written reports to clients periodically and as agreed to in our Letter of Engagement. We customize our reports based on the complexity of the client's holdings and level of details requested by the client. Reports may include such details as current or historical position values, allocation percentages, rates of return over various periods, and relative risk-return characteristics.

Item 14: Client Referrals and Other Compensation

The Planner's Edge® has not entered into any agreements with third parties to give or receive referrals for compensation.

Item 15: Custody

Although client assets are held at a third-party independent custodian, as a registered investment adviser in the state of Washington we are deemed to have custody of client funds in two circumstances: when we deduct advisory fees directly from client accounts, as authorized in our written Letter of Engagement, and when we have clients with standing letters of authorization on file with TD Ameritrade to move funds to a third party. Except for these two limited exceptions, we do not have authority to withdraw funds from individual client accounts. When we direct your custodian to deduct fees from your account, we will provide you with an itemized invoice.

Your qualified custodian will send you an account statement at least quarterly. This statement will identify the amount of funds and each security in the account at the end of the period and sets forth all transactions in the account during that period, including our fee that was deducted. These custodial statements are the official record of individual client accounts for tax and other recordkeeping purposes. We urge clients to review these statements carefully and compare them with invoices and statements received from The Planner's Edge®. Clients should notify both The Planner's Edge® and the custodian promptly of any discrepancies.

Item 16: Investment Discretion

The Planner's Edge[®], when acting as your investment advisor, may have a limited power of attorney to select, purchase, or sell securities without obtaining your specific consent within the account(s) you have under our management. The limited powers of attorney are granted in the written Letter of Engagement and/or TD Ameritrade agreements entered into between you and The Planner's Edge[®]. There are no restrictions upon the securities that may be purchased, sold, or held in your account unless you provide these restrictions to us in writing.

Item 17: Voting Client Securities

The Planner's Edge[®] will not vote proxies for securities held in your investment account. Your account custodian or transfer agent will send proxy statements directly to you. If the investment account is for a pension or other employee benefit plan governed by ERISA, you direct us not to vote proxies for securities held in the account, because the right to vote such proxies is expressly reserved for you or your plan fiduciary and not The Planner's Edge[®].

Item 18: Financial Information

The Planner's Edge[®] is not aware of any circumstance that is reasonably likely to impair our ability to meet contractual commitments to you or our other clients.

Prepayment of Fees

The Planner's Edge[®] does not require pre-payment of investment advisory fees of greater than \$1200 and never more than six months in advance.

Privacy Policy

The Planner's Edge® is committed to safeguarding the confidential information of its clients. We hold all personal information provided to us in the strictest confidence. We may also have relationships with other non-affiliated investment advisors, insurance companies, trust companies, custodians and other financial institution entities. Except as required or permitted by law, we do not share confidential information about clients with non-affiliated third parties. In the unlikely event there were to be a change in this fundamental policy that would permit additional disclosures of confidential client information, we will provide written notice to you, and you will be given an opportunity to direct whether the disclosure is permissible.

Customer Information Collected

We collect and develop personal information about you, and some of that information is non-public personal information ("Client Information"). The essential purpose for collecting Client Information is to provide and service the financial products and services you obtain from the firm. The categories of Client Information collected depend upon the scope of the Engagement with us and are generally described below. As an investment advisor, we collect and develop Client Information about you in order to provide investment advisory services. Client Information collected includes:

- Personal information used to open your account, such as social security number and date of birth.
- Financial information such as income, spending habits, statements of account, tax returns, and other records concerning your current financial condition and life circumstances.
- Information concerning investment advisory account transactions.

Data Security

We restrict access to Client Information to those representatives and employees who need the information to perform their job responsibilities within the firm. We maintain agreements, as well as physical, electronic, and procedural securities measures that comply with federal regulations to safeguard Customer Information about clients.

Use and Disclosure of Customer Information

To administer, manage and service customer accounts, process transactions and provide related services for client accounts, it is necessary for you to provide access to Client Information within the firm and to non-affiliated companies such as other investment advisors, other broker-dealers, trust companies, custodians, and insurance companies. We may also provide Client Information outside of the firm as permitted by law, such as to government entities, consumer reporting agencies, other third parties in response to subpoenas, or to explain our actions to professional organizations that we are members of.

Former Clients

If clients close an account with us, we will continue to operate in accordance with the principles stated in the Notice.