



Item 1 – Cover Page

FIRM BROCHURE  
Form ADV, Part 2 March 30, 2026

## The Retirement Planning Group

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This brochure provides information about the qualifications and business practices of The Retirement Planning Group, LLC. If you have any questions about the content of this brochure, please contact us at 913-498-8898. 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. The Retirement Planning Group is a Registered Investment Advisor with the United States Securities and Exchange Commission. This registration does not imply a certain level of skill or training. Additional information about The Retirement Planning Group is also available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2. Material Changes from last Annual Update**

This Brochure dated March 30, 2026, represents an amendment to the Brochure for The Retirement Planning Group, LLC.

Since the firm's most recent ADV filing dated February 12, 2026, there have been no material changes.

Pursuant to SEC Rules, we will deliver to you a summary of any materials changes to this and subsequent Brochures within 120 days of the close of our fiscal year. We will provide ongoing disclosure information about material changes as necessary. All such information will be provided to you free of charge. A copy of our current Brochure can be requested by contacting us at 913-498-8898.

Additional information about The Retirement Planning Group is also available via the SEC's website [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC's website also provides information about any persons affiliated with the firm who are registered as investment adviser representatives of the firm.

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## **Item 4. Advisory Business**

### **A. Firm Description**

The Retirement Planning Group (“TRPG”) is a fee-only investment advisor registered with the United States Securities and Exchange Commission. We have been in business since February 13, 2004. The firm’s executive officers are Kevin Conard, Ryan Costello, Kevin Jaegers, Lexie Barling, Chris Bouffard, Luke Crowther, Michelle Burchard and Matt Striegel.

The firm is headquartered in Leawood, KS with branch offices in:

San Ramon, CA  
Denver, CO  
Fort Myers, FL  
Honolulu, HI

Muskegon, MI  
St. Louis, MO  
Greensboro, NC  
Paramus, NJ

Binghamton, NY  
Houston, TX

### **B. Types of Services**

We provide advisory services and manage portfolios for individuals and high net worth investors. Many of our clients are approaching retirement or have already retired, but we work with clients at all stages of financial life. TRPG works with clients to determine their specific objectives and risk tolerance level. These objectives will be taken into consideration for management of their asset allocation. Our services include a wide scope of services an investor might require. These services include asset management and supervision, income and financial planning, Social Security optimization and advice concerning the various issues a retiree or pre-retiree will typically face.

### **C. How We Tailor our Advice for Our Clients**

At the beginning of our relationship, we take you through a detailed and formally structured financial planning process of our own design. This approach guides you through a comprehensive financial planning process.

In our initial planning appointment, we will ask a series of questions designed to identify your financial assets, financial goals and your personal vision for retirement. We also begin to educate you on the issues you may face in retirement. At the conclusion of the first appointment, your advisor will begin crafting a highly detailed retirement financial plan based on your responses. Then, your advisor will present your personalized retirement financial plan. This plan relies on the information you provided.

Your advisor will explore alternate scenarios designed to help you evaluate your options. Your advisor will help you understand the strengths and weaknesses of the scenarios we explore. At this time your advisor will also discuss our investment philosophy. Your advisor will spend time explaining the costs associated with the plan we created.

The culmination of this process is a personalized, written financial plan accompanied by a list of recommendations for how to implement the plan. This plan is updated periodically, usually annually. This update is based on a client meeting where we update the plan with current information and incorporate relevant changes. This revised plan is then used as a framework for on-going client advice. Clients are encouraged to promptly advise The Retirement Planning Group of any changes to their financial situation, investment objectives or risk tolerance.

Occasionally, this process may be abbreviated or even eliminated based on the needs and wishes of the client. In limited instances, we accept situations where a client imposes restrictions on investing in certain securities or types of securities. This is on a case-by-case basis and subject to our discretion.

The Retirement Planning Group is a fiduciary under the Employee Retirement Income Security Act (ERISA) with respect to investment management services and investment advice provided to ERISA plan clients, including ERISA plan participants. The Retirement Planning Group is also a fiduciary under the Internal Revenue Code (IRC) with respect to investment management services and investment advice provided to ERISA plans, ERISA plan participants, IRA owners and IRAs. As such, The Retirement Planning Group is subject to specific duties and obligations under ERISA and IRC that include, among other things, prohibited transaction rules which are intended to prohibit fiduciaries from acting on conflicts of interest. When a fiduciary gives advice in which it has a conflict of interest, the fiduciary must either avoid or eliminate the conflict or rely upon a prohibited transaction exemption. Under this PTE rule's provisions, we must: 1) Meet a professional standard of care when making investment recommendations, 2) Never put our financial interests ahead of yours when making recommendations, 3) Avoid misleading statements about conflicts of interest, fees, and investments, 4) Follow policies and procedures designed to ensure that we give advice that is in your best interest, 5) Charge no more than is reasonable for our services and 6) Give you basic information about conflicts of interest.

A client or prospective client leaving an employer typically has four options regarding an existing retirement plan and has the ability to engage in a combination of these options: 1) Leave the money in the former employer's plan, 2) Rollover the assets to the new employer's plan, 3) Rollover the assets to an Individual Retirement Account, 4) Liquidate the account. A conflict of interest arises when The Retirement Planning Group makes recommendations about ERISA plan distributions and rollovers ("rollover recommendations") if it results in TRPG receiving compensation that it would not have received absent the recommendation. For example, advisory fee on the rolled over assets. Under Rule PTE 2020-02, The Retirement Planning Group is required to perform an analysis of the plan such that the informed recommendation is in the best interest of the client. No client is under any obligation to roll over ERISA plan assets or IRA assets to accounts advised or managed by The Retirement Planning Group.

#### D. Selection of Brokers

You contract separately for brokerage and/or custodial services with either an affiliated or unaffiliated entity of ours.

During the account opening process, You open a custodial account with Pershing, a subsidiary of The Bank of New York Mellon Corporation, One Pershing Plaza, 4th FL., Jersey City, NJ 07399, National Financial Services LLC, a Fidelity Company (NFS) 200 Seaport Blvd Boston, MA 02210, Cetera Investment Services (CIS) 400 First St. Suite 300, St. Cloud, MN 56302, Charles Schwab, 2423 East Lincoln Drive, Phoenix, AZ 85016, or Fidelity Institutional Wealth Services (IWS), 100 Crosby Parkway, Covington, KY 41015. An affiliated entity of ours will serve as the broker-dealer associated with the Pershing and NFS custodians. CIS is our affiliated clearing broker-dealer. Charles Schwab, IWS, Pershing and NFS are not affiliates of the Firm.

Costs vary by custodian and broker-dealer, and are based on a number of factors, including but not limited to the particular service. Certain services will be more expensive than at other broker-dealers and custodians. The amount of brokerage account charges and fees, which Clearing broker and/or Your Broker-dealer receives a portion of, is summarized in the Fee Schedule for Your Account located on Your Broker-dealer's website at the following addresses: <https://www.ceteraholdings.com>, <https://www.schwab.com/legal/schwab-pricing-guide-for-advisor-services>, <https://www.fidelity.com/trading/commissions-margin-rates>.

Each affiliated broker-dealer's charges help defray the affiliated entity's costs associated with such services and include a profit to the affiliated firm. This additional compensation to each affiliate represents a conflict of interest because our affiliates receive a financial benefit when they provide services in connection with maintaining your account. This compensation, however, is retained by each affiliate and is not shared with your Advisor, so your Advisor does not have a financial incentive to recommend certain transactions or firms.

We and our affiliated broker-dealers have negotiated competitive pricing and services with the custodians for the benefit of our clients. They offer clients substantial financial strength and stability, economies of scale and reliable, state-of-the art technology. Services provided by custodians include, but are not limited to, discounted fees for institutional trading software, employees dedicated to servicing client accounts, educational conferences and events, publications and conferences on practice management and business succession, and support of training and conference events. Services are not contingent on any specific amount of custody or trading business. Custodian services may influence the firm's decision to direct you to open accounts.

We do not consider selecting or recommending broker-dealers and custodians, whether we or a related

person receives client referrals from a broker-dealer, custodian or third-party. The firm believes that executions obtained on transactions for you are competitive and the commissions are reasonable in relation to the value of brokerage services offered.

The broker-dealer and/or custodial relationship provides certain economic benefits when using an affiliated entity as the broker-dealer, rather than an unaffiliated broker-dealer. For example, our affiliated broker-dealers add a mark up to the transaction costs and mark up certain other brokerage related account charges and fees that are assessed to all client advisory accounts even for \$0-based charges, those transaction costs in which the custodian does not charge our affiliate a fee. The charges and fees that are marked up include, but are not limited to, paper delivery surcharge fees for client statements and confirmations, clearance and execution fees, outgoing account transfer fees, mandatory reorganization fees, checking account fees, inactive account fees, wire fees, legal transfer fees, bond redemption fees, termination fees, and IRA annual custodial maintenance fees which are set forth in in the affiliated firm's schedules and is also available from your advisor. The advisor and TRPG does not receive any portion of these charges. It is important to note that these transaction and service charges are negotiated with the broker-dealers and custodian and could be higher than the same charges you would pay at another firm, including a broker-dealer or custodian affiliated with us. If you would like further information on our affiliated broker-dealers' fee and services, please go the corporate website, [www.ceteraholdings.com](http://www.ceteraholdings.com).

The compensation structure for our affiliated broker-dealers between and amongst custodians varies depending upon a number of factors such as, but not limited to, transactions with and assets held at each applicable custodian. These revenue differences present a conflict of interest for the firm based upon the financial incentive to drive higher revenues to our affiliated entities.

In addition, you do not generally have the option to direct securities brokerage transactions to other broker-dealers or other custodians. If, however, you should request, and we approve, the use of a broker-dealer or custodian, other than those listed in this section, for securities transaction execution, you should be aware that we will generally be unable to negotiate commissions or other fees and charges for your account, and we would not be able to combine your transactions with those of other clients purchasing or selling the same securities in a block trade. As a result of your directing trades to a broker-dealer, we would be unable to ensure that your trades receive "best execution". By directing securities brokerage transactions, we could be unable to achieve the most favorable execution of your transactions, and you could pay more in transaction charges than if you executed trades through one of the broker-dealers or custodians we have listed in this section. Therefore, directed brokerage can cost you more money.

#### E. Additional Services Offered

**Tax Planning and Filing Services.** The Retirement Planning Group offers a proactive tax planning service. Tax specialists can assist clients at the beginning of the year to create and implement a customized tax plan that helps minimize tax liability throughout the year. As the year progresses, Tax Specialists can continue to analyze and support clients' tax needs to maintain a well-organized tax plan. The Retirement Planning Group's Tax Specialists can help forecast future client needs to implement long-term strategies aimed at helping reduce client tax liability in years to come. The Retirement Planning Group offers tax preparation services. Clients needing tax preparation may utilize our team of tax professionals and CPAs but are not obligated to do so. If you choose to engage us for tax preparation services, you will enter into a separate agreement and pay a separate fee in addition to the fees paid to The Retirement Planning Group for investment advisory or other services. Please Note: The Retirement Planning Group is not a certified public accounting (CPA) firm.

**Bookkeeping and Payroll Services.** At The Retirement Planning Group, we provide reliable and professional bookkeeping and payroll services tailored to meet the unique needs of your business. Our bookkeeping solutions ensure that your financial records are accurate, up-to-date and fully compliant with industry standards allowing you to make informed decisions. Our payroll services are efficient, timely and designed to handle all aspects of employee compensation, including tax calculations, deductions and reporting. If you choose to engage us for bookkeeping and/or payroll services, you will enter into a separate agreement for each service and pay a separate fee in addition to the fees paid to The Retirement Planning Group for investment advisory or other services.

**Legacy Wealth Strategies.** TRPG utilizes an independent third-party service provider to offer estate planning services to Clients through TRPG's Legacy Wealth Strategies department. These services include, but are not limited to, reviewing and analyzing Client's existing estate planning documents, offering education related to basic estate planning concepts and techniques, facilitating the creation of new or updated estate planning documents, and providing detailed diagrams and reports summarizing Client's estate plan. The scope of estate planning services provided to Client will depend on the nature of Client's specific estate planning needs.

Fees paid by Client to TRPG for estate planning services are separate from any investment management services or other services TRPG may render to Client and will be provided under a separate written agreement. Fees charged to client for such services are for preliminary information gathering, administering access to and assisting the client in navigating the online document creation platform, and where appropriate, coordinating legal services with outside attorneys and facilitating the execution of Client's estate planning documents. TRPG is not a law firm, does not engage in the practice of law, and does not render legal advice or legal services.

**Retirement Plan Advice and Consulting Services.** Retirement plans subject to the Employee Retirement Income Security Act of 1974 (ERISA) may retain an Advisor of TRPG to provide advisory and consulting services to a retirement plan. In providing these services, TRPG may act as a fiduciary, as defined under Section 3(21) of ERISA and will adhere to the provisions outlined by ERISA to provide the highest standard of care to qualified retirement plans.

Plan Advice and Consulting Services. Fiduciary advisory services available under the Plan and Consulting Services Program include: 1.) Fiduciary services, 2.) Educational services, 3.) Service provider recommendations, 4.) Assist in selecting and monitoring investment option available under the Plan, 5.) Provide guidance in developing a written investment policy statement for the Plan, 6.) Act as a co-fiduciary in accordance with ERISA section 3(21), 7.) Provide ongoing advice regarding asset allocation and risk management, and 8.) Prepare periodic performance reports and investment reviews.

**F. Wrap Fee Programs**

We do not provide portfolio management services to Wrap Fee Programs.

**G. Value of Assets Under Management**

We manage assets on either a discretionary basis or a non-discretionary basis. As of 12/31/2025, the values of these assets are as follows:

	# Accounts	Dollar Value
Discretionary Assets:	13,415	\$ 4,311,185,861
Non-Discretionary Assets:	495	\$139,821,835
Total Assets Under Management:	13,910	\$ 4,451,007,696

**Item 5. Fees and Compensation**

Other brokerage account charges, such as but not limited to stop payment fees, Fed Fund Wire Fees and margin interest will be charged to your account when applicable; a list of those fees that can be charged are available on affiliated firm’s website at [www.ceteraholdings.com](http://www.ceteraholdings.com), from your custodian, or can be obtained from your advisor. These other brokerage account fees and expenses vary based on a number of factors, including but not limited to, the particular service. When our affiliated entity is selected as custodian/broker-dealer, these charges defray our costs associated with such services and include a profit to our affiliate. The additional compensation to our affiliate represents a conflict of interest because our affiliate receives a financial benefit when it provides services in connection with maintaining your account. This compensation, however, is retained by the affiliate and is not shared with your advisor, so your advisor does not have a financial incentive to recommend certain transactions or firms to provide such additional services.

Additionally, for certain mutual fund purchases and sales, your custodian will assess your account a servicing fee of up to \$20. These charges are applicable to both wrap and non-wrap fee program accounts. The custodian will retain the entire servicing fee. Firm, advisor, and our affiliates do not share any part of this servicing fee, so none of these parties have a financial incentive to recommend these types of mutual fund purchases and sales over other types of securities transactions. This additional up to \$20 servicing fee makes the cost to you of certain mutual fund purchases and sales higher than other securities purchases and sales. your advisor, upon request, will provide you with the most up to date list of mutual funds for which your custodian assesses the up to \$20 servicing fee, which changes from time to time. This fee is charged to your account regardless of whether the program is a wrap or non-wrap program.

#### A. How We are Compensated for Our Services

Clients will be charged advisory fees in advance at the beginning of each calendar quarter based upon the value of the client's account(s) at the end of the previous quarter. New accounts are charged a pro-rated fee for the remainder of the quarter in which the account was established. TRPG will request authority from clients to receive quarterly payments directly from the client's account held by an independent qualified custodian. Clients must provide written limited authorization to TRPG to withdraw advisory fees. We are only receiving compensation from asset management and are considered to be fee only.

The annual fee for The Retirement Planning Group's services is charged on a quarterly basis and based on a percentage of assets under management and ranges from 0.25% to 2.00% per year depending on the size and complexity of the client's account(s). The specific fee is stated in the Investment Management Agreement signed by the client. In limited cases and under special circumstances, we will depart from our standardized approaches and negotiate a modified fee arrangement. As our investment management compensation is based on a percentage of assets under management, our success is closely linked to your success.

We also perform non-management advisory services and or financial planning services, and such services can be ongoing in nature or can be a one-time project. These types of services can be provided in conjunction with investment management services or on a stand-alone basis for a separate fee. Such stand-alone services may be billed on a fixed fee rate or on an hourly basis depending on the engagement. Hourly rates generally begin at \$300 per hour and fixed fee rates generally begin at \$1,000. The firm does however reserve the right to waive fees for certain engagements.

#### B. How Fees are Billed

**Fees and Compensation.** For investment management services, you agree to pay an asset-based fee calculated, quarterly in advance, based on the last trading day of the calendar quarter. In a limited

number of circumstances (i.e., certain advisors who were offering monthly billing to their clients for similar investment advisory services prior to their association with us), the asset-based fee for your account shall be paid monthly in advance, based on the last trading day of the calendar month.

Your initial client fee will be debited from your account in the next billing cycle after your account has been funded and will be based on the value of the account at the time of its initial investment. If the account is funded after the first day of a billing cycle, the initial client fee will be prorated and included with your next full bill. Thereafter, the client fee will be calculated quarterly (or monthly, if applicable), in advance (or arrears, if applicable) based on your account in accordance with its normal practices and procedures and such determination will be binding on the parties to this Agreement.

You will pay the following fees, as applicable.

Clearing broker Fees: you contract separately with broker-dealer and or clearing broker for their services. These are fees that clearing broker and/or broker-dealer will charge to your account when you select such a service. For Information on clearing broker and/or broker-dealer charges you should refer to your agreement and disclosure documents with the clearing broker and/or broker-dealer.

The default billing method is to debit advisory fees for each account respectively, although you have the option for a consolidated management fee to be deducted from one primary account, instead of having management fees deducted from each account, provided this primary account is not a retirement account and that the accounts have the same advisor(s). If you consolidate accounts, then the primary account will have lower performance returns than it would otherwise have, and your other accounts will have higher returns than they would otherwise have. To determine whether or not to consolidate household your accounts, please consult your advisor. Generally, householding your accounts will result in a financial benefit to you due to reduced overall client fees and should be considered where applicable.

For client accounts with a Hawaii address of record, the Hawaii general excise tax will be deducted on a quarterly basis directly from each client account based on the fee incurred that quarter.

**Termination of Services.** Advisory services can be terminated at any time by either party for any reason upon notice to the other party. Termination by you is effective upon our receipt of such notice, unless a later date is requested in your notice and agreed to by us. Termination by us is effective thirty (30) days from date of notice to you, unless an earlier or later date is stated in the notice. Upon termination, we will refund to you a pro rata portion of the investment management fee paid in advance within thirty (30) days from the effective date of termination. Similarly, for clients who are billed in arrears, a final prorated bill for services rendered will be issued.

### C. Other Fees and Expenses

Our clients pay brokerage and custodial expenses incurred through the routine management of their accounts. We receive no part of these expenses. These expenses go entirely to the broker-dealer and/or custodian. When our affiliated entity is selected as custodian/broker-dealer, these charges defray our costs associated with such services and include a profit to our affiliated Firm. The additional compensation to our affiliate represents a conflict of interest because our affiliate receives a financial benefit when it provides services in connection with maintaining your account. This compensation, however, is retained by the affiliate and is not shared with your Advisor, so your advisor does not have a financial incentive to recommend certain transactions or firms to provide such additional services.

Certain individual investments we use such as mutual funds and exchange-traded funds (ETFs), for example, contain an expense ratio. No part of this expense ratio is shared with us. (See Item 5.E for further discussion). All fees paid to The Retirement Planning Group are separate from the fees and expenses charged by mutual funds and ETFs to their shareholders or the transaction fees charged by the broker-dealer and/or custodian. Security expenses are described in each fund's prospectus. These expenses generally include a management fee, other fund expenses, and possibly a distribution fee.

For certain mutual fund purchases and sales, the clearing broker charges a servicing fee of up to \$20, which will be charged to your account. The custodian will retain the entire servicing fee. Firm, advisor, and our affiliates do not share any part of this servicing fee, so none of these parties have a financial incentive to recommend these types of mutual fund purchases and sales over other types of securities transactions. This additional fee up to \$20 servicing fee makes the cost to you of certain mutual fund purchases and sales higher than other securities purchases and sales. Your advisor, upon request, will provide you with the most up to date list of mutual funds. The mutual fund list will change from time to time and will vary by clearing broker. The servicing fee will also vary by clearing broker.

### D. Incentive or Commission Based Sales of Securities

Neither our firm, nor its advisors, accepts compensation for the sale of securities through commissions, marketing or distribution fees (such as 12B-1 fees), sales charges or service fees. We believe these practices are conflicts of interest in that they create incentives for an advisor to recommend investment products based on the compensation received, rather than on the client's needs.

We chiefly use mutual funds and exchange-traded funds (ETFs) for our clients. These investment options are widely available and obtained through sources that are not affiliated with The Retirement Planning Group.

### **Item 6. Performance-Based Fees and Side-by-Side Management**

The Retirement Planning Group does not charge performance-based fees, nor do we engage in side-by-

side management.

### **Item 7. Types of Clients**

The firm generally provides advisory services for, but not limited to, individuals, tax-qualified retirement plans, and other institutions. We work with clients at all stages of their financial life.

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

#### **A. Methods of Analysis and Investment Strategies**

Our investment strategy involves chiefly the selection of, but not limited to, mutual funds and exchange traded funds (ETFs) for our clients' portfolios. This is done through various means of research available to us. We primarily use well-diversified portfolios of an allocation designed to be in line with a client's expressed capacity for risk. Regardless of strategy and methods used, clients should be aware that investment in securities involves risk of loss that you should be prepared to bear.

Our strategies and investments could have unique and significant tax implications. Unless we specifically agree 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.

You understand that the purchases and sales of the securities, including those resulting from reallocation or rebalancing of the Account(s), could result in taxable events. We do not manage for tax efficiency and do not provide tax advice unless specifically stated or separately agreed to. Certain trading strategies aim to reduce tax burdens. We make no representations as to the success of any investment strategy. You acknowledge that we make no guarantee or offer any protection against loss.

Important Note: It is the client's responsibility to promptly inform the advisor of any material changes to your financial situation, or if your portfolio allocation does not match your risk tolerance.

#### **B. Risk of Loss**

Our investment approach includes investing in the stock market. Investing in the stock market carries risk. We try to reduce risk by diversifying a portfolio across multiple asset classes. We take great pains to explain these risks to our clients. If you feel you do not fully understand these risks, you should consult your advisor.

We make no guarantee of return. All investments are subject to fluctuation in value and potential loss of principle. As with any investment, you could lose all or part of your investments, and your account's performance could trail that of other investments.

- Market Risk – The value of a security may decline due to general market conditions, economic

trends or other events resulting in a decrease in the value of client investment.

- Equity Securities Risk – Equity securities (common stocks) could decline in value if the issuer’s financial condition declines, or in response to overall market and economic conditions. Investments in smaller or mid-size companies can involve greater risk and price volatility than investments in larger, more mature companies.
- Fixed-Income Securities Risk – Fixed-income securities (bonds) are subject to interest rate risk and credit quality risk. The market value of fixed-income securities generally declines when interest rates rise, and an issuer of fixed-income securities could default on its payment obligations.
- Asset Allocation Risk – A fund’s selection and weighting of asset classes and underlying funds can cause it to underperform other funds with a similar investment objective.
- Concentration Risk – Portfolio allocations that are concentrated in a particular market, industry or asset class, are susceptible to loss due to adverse occurrences affecting that market, industry or asset class.
- Management Risk – The performance of your account is subject to the risk that our investment management strategy may not produce the intended results.
- Regulatory Risk – Changes in government laws and regulations could adversely affect the value of a security, business sector or market. A change in laws or regulations made by the government or a regulatory body can increase the costs of operating a business, reduce the attractiveness of an investment or change the competitive landscape in a given business sector.
- Cybersecurity Risk – The computer systems, networks and devices used by TRPG and service providers to us and our clients to carry out routine business operations employ a variety of protections designed to prevent damage or interruption from computer viruses, network failures, computer and telecommunication failures, infiltration by unauthorized persons and security breaches. Despite the various protections utilized, systems, networks or devices potentially can be breached. A client could be negatively impacted as a result of a cybersecurity breach.

Cybersecurity breaches can include unauthorized access to systems, networks or devices; infection from computer viruses or other malicious software code; and attacks that shut down, disable, slow or otherwise disrupt operations, business processes or website access or functionality. Cybersecurity breaches can cause disruptions and impact business operations, potentially resulting in financial losses to a client; impediments to trading; the inability by us and other service providers to transact business; violations of applicable privacy and other laws; regulatory fines, penalties, reputational damage, reimbursement or other compensation costs, or additional compliance costs, as well as the inadvertent release of confidential information.

Similar adverse consequences could result from cybersecurity breaches affecting issuers of securities in which a client invests; governmental and other regulatory authorities; exchange and other financial market operators, banks, brokers, dealers and other financial institutions and other parties. In addition, substantial costs may be incurred by these entities in order to prevent any cybersecurity breaches in the future.

### **Item 9. Disciplinary Information**

We have had no disciplinary actions against us or any employee within the last 10 years by any domestic, foreign, or military court; the SEC, or any regulatory agency; any state regulatory agency or any foreign financial regulatory authority; or any self-regulatory organization (SRO).

### **Item 10. Other Financial Industry Activities and Affiliations**

The Retirement Planning Group, LLC is wholly-owned by Aretec, Inc. (“Aretec”). Aretec is a wholly-owned subsidiary of GC Two Intermediate Holdings, Inc. and an indirect wholly-owned subsidiary of GC Two Holdings, Inc. and an indirect wholly-owned subsidiary of GC Two Holdings LLC and GC Three Holdings, LLC.

Avantax Advisory Services, Avantax Planning Partners, Inc, and Avantax Investment Services, Inc are also wholly-owned by Aretec Group, Inc. (“Aretec”). Aretec is a wholly-owned subsidiary of GC Two Intermediate Holdings, Inc., and an indirect wholly-owned subsidiary of GC Two Holdings LLC and GC Three Holdings, LLC.

Cetera Financial Group, Inc. (Cetera Financial Group”) is an indirect subsidiary of Aretec. Cetera Financial Group is a network of financial service firms. Cetera Financial Group owns a network of independent broker-dealers, investment advisers registered with the SEC, and general insurance agencies. Information about these related firms appears on our Form ADV Part I, Schedule D, which is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) or by calling our office.

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

#### **A. Code of Ethics Summary**

We have adopted, as required by the Investor Advisers Act of 1940, 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 Retirement Planning Group.

#### **B. Conflict of Interest when Recommending Securities**

We do not recommend to clients, nor buy or sell in client accounts, securities in which we have a material financial interest. This would create an unacceptable material conflict of interest which could be harmful

to our clients.

C. Conflict of Interest when Firm Employees Own Same Securities as Our Clients

Our advisors, as individuals, are permitted to invest in the same widely traded investments we recommend for our clients. In essence, we follow the same advice we provide to our clients. This situation technically creates a potential for a conflict of interest between us and our clients. Our advisory practice makes use of widely traded mutual funds and exchange-traded funds (ETFs). These investments are traded in very large volumes every day. Further, we chiefly use index funds which contain all the companies found on an underlying index.

We acknowledge that this situation creates the potential for a conflict of interest in that an advisor could manipulate his own holdings to the detriment of the client. However, in light of the large trading volumes of the particular investments we use with our clients, the number of other parties trading in the same investments and the comparatively small value of the holdings owned by our advisors, the appreciable impact on the markets is minimal. Thus, we feel the potential for harm to our clients is insignificant. That said, we continue to be aware of this issue.

D. Conflict of Interest when Firm Members Buy and Sell Same Securities as Our Clients

In a related issue, our advisors, as individuals, occasionally buy and sell the same widely traded investments we buy and sell in our clients' account(s). As above, we follow the same advice we provide to our clients. This situation creates a potential for a conflict of interest between us and our clients.

One of the hallmarks of our asset management style is timely rebalancing accounts. This typically happens when a particular investment holding falls below, or exceeds, a certain desired percentage in an account. When this happens in one account, it often happens in multiple accounts.

We acknowledge that this situation creates the potential for a conflict of interest in that an advisor could time his own transactions relative to the client's transaction and unfairly benefit. However, in light of the immense trading volumes of the particular individual investments we use with our clients, the millions of other parties trading in the same investments and the comparatively small value of the holdings owned by our advisors, the appreciable impact of this practice would be minimal. Thus, we feel the potential for harm to our clients is insignificant. That said, we continue to be aware of this issue.

**Item 12 – Brokerage Practices**

Selection of Brokers. You contract separately for brokerage and/or custodial services with either an affiliated or unaffiliated entity of ours. During the account opening process, you open a custodial account with Pershing, a subsidiary of The Bank of New York Mellon Corporation, One Pershing Plaza, 4th FL., Jersey City, NJ 07399, National Financial Services LLC, a Fidelity Company (NFS) 200 Seaport Blvd Boston,

MA 02210, Cetera Investment Services (CIS) 400 First St. Suite 300, St. Cloud, MN 56302, or Charles Schwab & Co.(Schwab) 2423 East Lincoln Drive, Phoenix, AZ 85016 or Fidelity Institutional Wealth Services (IWS), 100 Crosby Parkway, Covington, KY 41015. An affiliated entity of ours will serve as the broker-dealer associated with the Pershing and NFS custodians. CIS is our affiliated clearing broker-dealer. Schwab, Pershing, NFS and IWS are not affiliates of the firm.

Costs vary by custodian and broker-dealer, and are based on a number of factors, including but not limited to, the particular service. Certain services will be more expensive than at other broker-dealers and custodians. The amount of brokerage account charges and fees, which clearing broker and/or your broker-dealer receives a portion of, is summarized in the fee schedule for your account located on your broker-dealer's website at the following addresses: <https://www.ceteraholdings.com>, <https://www.schwab.com/legal/schwab-pricing-guide-for-advisor-services>, <https://www.fidelity.com/trading/commissions-margin-rates>.

Each affiliated broker-dealer's charges help defray the affiliated entity's costs associated with such services and include a profit to the affiliated firm. This additional compensation to each affiliate represents a conflict of interest because our affiliates receive a financial benefit when they provide services in connection with maintaining your account. This compensation, however, is retained by each affiliate and is not shared with your Advisor, so your Advisor does not have a financial incentive to recommend certain transactions or firms.

We and our affiliated broker-dealers have negotiated competitive pricing and services with the custodians for the benefit of our clients. They offer clients substantial financial strength and stability, economies of scales, and reliable, state-of-the-art technology. Services provided by custodians include, but are not limited to, discounted fees for institutional trading software, employees dedicated to servicing client accounts, educational conferences and events, publications and conferences on practice management and business succession, and support of training and conference events. Services are not contingent on any specific amount of custody or trading business. Custodian services may influence the firm's decision to direct you to open accounts. We do not consider selecting or recommending broker-dealers and custodians, whether we or a related person receives client referrals from a broker-dealer, custodian or third party. The firm believes that executions obtained on transactions for you are competitive and the commissions are reasonable in relation to the value of brokerage services offered. The broker-dealer and/or custodial relationship provides certain economic benefits when using an affiliated entity as the broker-dealer, rather than an unaffiliated broker-dealer. For example, our affiliated broker-dealers add a mark up to the transaction costs and mark up certain other brokerage related account charges and fees that are assessed to all client advisory accounts even for \$0 -based charges, those transaction costs in which the custodian does not charge our affiliate a fee. The charges and fees that are marked up include, but are not limited to, paper delivery surcharge fees for client

statements and confirmations, clearance and execution fees, outgoing account transfer fees, mandatory reorganization fee, checking account fees, inactive account fees, wire fees, legal transfer fees, bond redemption fees, termination fees, and IRA annual custodial maintenance fees which are set forth in the affiliated firm's schedule and is also available from your advisor. The advisor and TRPG do not receive any portion of these charges. It is important to note that these transaction and service charges are negotiated with the broker-dealers and custodians and could be higher than the same charges you would pay at another firm, including a broker-dealer or custodian affiliated with us. If you would like further information on our affiliated broker-dealers' fees and services, please go to the corporate website, [www.ceteraholdings.com](http://www.ceteraholdings.com).

The compensation structure for our affiliated broker-dealers between and amongst custodians varies depending upon a number of factors such as, but not limited to, transactions with and assets held at each applicable custodian. These revenue differences present a conflict of interest for the firm based upon the financial incentive to drive higher revenues to our affiliated entities.

In addition, you do not generally have the option to direct securities brokerage transactions to other broker-dealers or other account custodians. If, however, you should request, and we approve, the use of a broker-dealer or custodian, other than those listed in this section, for securities transaction execution, you should be aware that we will generally be unable to negotiate commissions or other fees and charges for your account, and we would not be able to combine your transactions with those of other clients purchasing or selling the same securities in a block trade. As a result of your directing trades to a broker-dealer, we would be unable to ensure that your trades receive "best execution". By directing securities brokerage transactions, we could be unable to achieve the most favorable execution of your transactions, and you could pay more in transaction charges than if you executed trades through one of the broker-dealers or custodians we have listed in this section. Therefore, directed brokerage can cost you more money.

We do not maintain custody of your assets that we manage, although we are deemed to have custody of your assets if you give us authority to withdraw assets from your account (See Item 15). Your assets must be maintained in an account at a "qualified custodian," generally a broker-dealer or bank. The custodian will hold your assets in a brokerage account and will buy and sell securities when we or you instruct them to.

**Best Execution.** The firm is obliged to ensure orders are being sent to the markets in an efficient manner and to execute any purchases and sale transactions in the manner it believes is appropriate for the client. The firm strives to achieve the most favorable execution of the transactions to implement the client's investment strategy. The determinative factor is not whether the lowest possible price is obtained but whether the transaction represents the best qualitative execution for the Client account and, taking into

consideration the full range of a broker-dealer and/or custodian services, including the value of research provided, safety of customer funds, execution capability, commission rates and responsiveness. Accordingly, although the firm will seek competitive rates, to the benefit of all clients, it will not necessarily obtain the lowest possible costs for specific client account transactions. In recommending custodians/broker-dealers, the Firm considers many elements such as, but not limited to, the following:

- Quality of overall execution services provided
- Promptness of execution
- Creditworthiness, financial condition, and business reputation
- Promptness and accuracy of reports on execution
- Ability and willingness to correct errors
- Ability to access various market centers
- The custodian's facilities, technology & technology integrations
- Transaction and other service costs charged to clients
- Execution capabilities and operational efficiencies
- Product specialty and availability (types of securities)
- Banking, charitable & trust services offered

The transaction and any other brokerage fees will be more, or less, depending on the broker-dealer and/or custodial firm. If you would like further information to compare the fees and services provided by affiliated and unaffiliated broker-dealer and/or custodial firm, please go to their corporate website located here: [www.ceteraholdings.com](http://www.ceteraholdings.com), [www.schwab.com](http://www.schwab.com) and [www.fidelity.com](http://www.fidelity.com).

No-Transaction Fee Mutual Funds (NTF) are available depending on program and custodian. An NTF does not charge trading fees when investors buy or sell qualifying share of the fund. Clearing brokers and/or custodial firms can offer a collection of NTFs and at their sole discretion add or remove NTFs without prior notice. The transaction costs are waived on certain purchases that would normally carry a transaction charge.

**Products and Services Available to Us from Our Custodians.** The custodians provide us and our clients with access to their institutional brokerage services like trading, custody, reporting, and related services, many of which are not typically available to retail customers. The custodians also make available various support services, some of which help us manage or administer our clients' accounts, while others help us manage and grow our business. Other institutional brokerage services which benefit you directly include access to a broad range of investment products, execution of securities transactions, and asset custody.

The custodians make available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our

clients' accounts and operating our firm. They include investment research, both the custodians' own and that of third parties. We use this research to service all or a substantial number of our clients' accounts, including accounts not maintained at the custodians. In addition to investment research, the custodians make available software and other technology that provide access to client account data, facilitates trade execution for multiple clients' accounts, provides pricing and other market data, facilitates payment of our fees from our clients' accounts, and assists with back-office functions, recordkeeping, and client reporting.

The custodians also offer other services intended to help us manage and further develop our business. These services include educational conferences and events, consulting on technology, compliance, legal, and business needs, publications and conferences on practice management and business succession, and access to employee benefits providers, human capital consultants, and insurance providers.

The availability of these services from the custodians benefits us because we do not have to produce or purchase them. This gives us an incentive to recommend that you maintain your account with a particular custodian based on our interests rather than yours, which is a potential conflict of interest. We believe, however, that our recommendation of a custodian is in the best interests of our clients, and is primarily supported by the scope, quality, and price of the custodian's services and not the custodian's services that benefit only us.

Transactions for each client are considered and entered independently. We often aggregate such trades when it will benefit you. In such instances we will aggregate purchases and sales of securities in 'block trades.' When we engage in block trades, we allocate securities to individual client accounts in a manner that is designed so that no individual account is disadvantaged over time.

### **Item 13 – Review of Accounts**

#### **A. Periodic Review of Client Accounts**

We periodically review our clients' accounts and their financial plans. For those clients who hire us to provide investment management services, we review account(s) at least quarterly. We also in many cases use specialized software that monitors accounts and alerts advisors when an account requires attention. In addition, we will perform additional reviews when, in our opinion, circumstances warrant them. Reviews are conducted by the client's primary advisor or a member of the Investment team. You are encouraged to discuss your needs, goals, and objectives with us and to keep us informed of any changes.

For those clients who hire us to create and maintain a financial plan, we formally update and review this plan periodically, usually at least once per year. We are happy to perform more frequent reviews as needed, such as at retirement or some other major life change. There is no charge to clients for these

additional reviews. These reviews are conducted by the client's primary advisor. You are encouraged to discuss your needs, goals, and objectives with us and to keep us informed of any changes. In addition, firm model portfolios are under regular supervision by the firm's Chief Investment Officer, Chris Bouffard, CFA®, as well as the Investment Committee.

**B. Content and Frequency of Client Reports**

In addition to monthly brokerage statements provided by our clients' custodian, we provide tailored performance reports for all our clients. These reports contain critical information to inform our clients regarding the investment performance of their managed accounts. Specifically, these reports contain data such as rates of returns over various periods of time, lists of investments, and overviews of account performance. We strongly recommend you compare these performance reports to the account statements you receive from your custodian. Notices that these reports are available are electronically transmitted to clients on a quarterly basis. Clients may request an updated report from their advisor at any time.

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

**A. Conflict of Interest from Sales Awards or Other Prizes**

As stated in Item 5, our firm and advisors are compensated solely by a management fee for our advisory and accounting services. Employees may receive compensation for certain client referrals. Neither our firm, nor its advisors, accepts compensation through commissions, marketing or distribution fees (sometimes known as 12B-1 fees), sales charges or service fees for advisory services. Further, we do not accept any economic benefit (such as a management fee, sales awards or other prizes, or other consideration) for our advisory services from any third-party.

**B. Compensation to Third-party for Client Referrals.**

From time to time, TRPG compensates a third-party for client referrals. When a prospective client is introduced to us by either an unaffiliated individual or affiliated individual or company, we will pay a referral fee according to the agreement between the third-party and our firm. Promoter arrangements inherently give rise to potential conflicts of interest because the promoter is receiving an economic benefit for the recommendation of our advisory services. Clients should understand that any referral fees incurred are paid by our firm and do not result in any additional fees or charges to the client.

In accordance with federal and state Promoter rule requirements, each prospective client introduced to us by a third-party will receive a disclosure document stating the referral arrangement. The disclosure document outlines the nature of the relationship, including any affiliation, and specific compensation arrangements between the third-party and The Retirement Planning Group. The prospective client will receive the firm's Adviser Brochure along with the disclosure document. In addition, the firm participates in compensation arrangements with third parties in which the firm will pay a flat monthly fee for client

referrals. These types of arrangements will not increase investment management fees paid by our client.

Referrals are made between the wealth management and the tax & accounting services departments recommending the other's services to their respective clients. A conflict of interest exists as the employee may receive compensation for the referral to another department. The client is not obligated to engage in either department for the recommended services. Any referral amount paid to an employee by either department will not increase the amount of fees paid by a client.

#### C. Additional Services we Receive

We, our advisors and our affiliates receive reimbursement of training and educational meeting costs, promotional items, meals, entertainment or other non-cash compensation from investment product sponsors, as permitted by applicable regulation and rules. Additionally, sales of investment products, such as mutual funds, exchange traded products, and alternative investment products, including those offered by strategic partners, often qualify our advisors for additional business support and for attendance at seminars, conferences and entertainment events.

We receive an economic benefit from Schwab in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at Schwab. In addition, Schwab has also agreed to pay for certain products and services for which we would otherwise have to pay once the value of our clients' assets in accounts at Schwab reaches a certain size. In some cases, a recipient of such payments is an affiliate of ours or another party which has some pecuniary, financial or other interests in us (or in which we have such an interest). You do not pay more for assets maintained at Schwab as a result of these arrangements. However, we benefit from the arrangement because the cost of these services would otherwise be borne directly by us. You should consider these conflicts of interest when selecting a custodian. The products and services provided by Schwab, how they benefit us, and the related conflicts of interest are described above (see Item 12— Brokerage Practices).

#### D. Cash Sweep Programs

The firm's affiliated broker-dealer(s) maintain bank deposit sweep programs that create financial benefits for the affiliates as described below. The affiliates receive additional compensation for non-retirement account assets that are swept into the money market fund sweep program as described below. The additional compensation received by the affiliate creates a conflict of interest with the firm's clients.

FDIC Insured Bank Deposit Sweep Account. The Federal Deposit Insurance Corporation (FDIC) is an independent federal agency insuring deposits in U.S. banks and thrifts in the event of bank failures. The FlexInsured Account Program and the Insured Deposit Sweep Account Program (FDIC-Insured Programs),

made available by the broker-dealer that is an affiliated entity of the firm (Related BD) enable clients' available cash balances awaiting investment or reinvestment in eligible accounts, including cash balances derived from the sale of securities, dividend payments, interest credited from bonds, and cash deposits, to be automatically deposited (swept) into interest bearing deposit accounts offered through one or more participating program banks (Program Banks). Deposits at an individual Program Bank are covered by FDIC insurance up to \$2,500,000, subject to bank availability. For purposes of calculating the available FDIC coverage at each Program Bank, cash deposited at a Program Bank is aggregated with all other deposits held by you outside of the FDIC-Insured Programs in the same insurable capacity at that Program Bank. Under certain economic conditions or for other reason, it is possible for Program Banks to limit or reduce the amount of deposits they will accept through FDIC-Insured Programs. If Program Banks cannot accept all the cash balances in your account due to such capacity constraints, then your excess funds will be invested in shares of a money market fund that the Related BD makes available. If the money market fund is not accepting excess funds, then those excess funds will be maintained in your account a free credit balance (discussed below). The overall amount of available FDIC insurance protection will vary depending upon the number of Program Bank accepting deposits through the FDIC-Insured Programs at any time. If most of all of the Program Banks have insufficient capacity to accept any funds (or any further funds), then the aggregate amount of FDIC insurance coverage available to you could be significantly reduced.

Should you wish to move your free credit balance into a money market mutual fund or other product that are available for purchase, such as U.S. Treasuries or a brokered Certificate of Deposit, your advisor can assist you. If you are invested in a wrap fee program, all transaction charges are included in the fees you pay for that program. We also offer a limited number of non-wrap fee programs which would require you to pay the transaction charge for purchasing such a product. If you are unsure of what type of program you are in, please discuss with your advisor. You should consider your investment objectives, liquidity needs and risk tolerance in reviewing whether participation in the applicable FDIC-Insured Program or another product is appropriate for you. If you desire to maintain a large cash position for an extended period of time, you should contact your advisor to discuss your options.

It is your responsibility to monitor any deposits that you have at each Program Bank including deposits outside of the FDIC-Insured Programs so that you do not exceed the applicable limits on FDIC insurance coverage as described above. Funds deposited through the FDIC-Insured Programs are not eligible for SIPC protection.

FlexInsured Account Program. The FlexInsured Account is the default sweep vehicle for non-retirement advisory accounts. For its role in offering the FlexInsured Account Program, the Related BD earns additional compensation in the form of a payment of a portion of the earned interest received from a Program Bank (payment) which is based on the amount of money on deposit by all FlexInsured Account

Program participants and the applicable interest paid at that time by that Program Bank. The amount of a payment to the Related BD will vary but will not exceed a maximum percentage on an annualized basis, as applicable, as applied across all FlexInsured Accounts which is provided in the applicable disclosure document which can be found at [www.ceteraholdings.com](http://www.ceteraholdings.com). The maximum annual percentage to be received by the Related BD may be changed upon 30 days' prior notice to participants in the FlexInsured Account Program. The Related BD, in its discretion, may reduce the amount of a payment and vary the reductions among clients which would result in some clients getting paid a higher interest rate, and therefore earning more interest than other clients. Additionally, the payments the Related BD receives generally vary by Program Bank and will affect the interest rate paid to you.

This compensation presents a conflict of interest, because the Related BD receives a greater financial benefit when cash is swept into the FlexInsured Account than it otherwise would if your cash balance is held in a money market mutual fund or other product, and the fees that the Related BD receives reduces the amount of interest you receive in the FlexInsured Account. The interest that you receive, and the Related BD's fees are both paid from the total fund paid by the Program Bank on FlexInsured Accounts. Consequently, the greater the fees received by the Related BD, the less funds are available to pay client interest on FlexInsured Account deposits. In addition, we continue to charge an investment advisory fee while your cash is held in the FlexInsured Account so the fees that we receive from the Program Banks are in addition to the advisory fees that you pay. This means that we earn two layers of fees on the same cash balances in your FlexInsured Account. If we were to reduce or eliminate our advisory fee for cash balances held in FlexInsured Accounts where such fee reduction is greater than the amount of compensation we receive on FlexInsured Account deposits, this would create a conflict of interest for us to avoid or minimize such cash holdings or to utilize other products, where available.

The interest rate you earn will generally be lower than interest rates available to depositors in interest-bearing accounts held directly at a Program Bank or other FDIC-insured depository institutions, but such institutions could require a minimum amount to establish an interest-bearing deposit account that is maintained outside of the FDIC-Insured Programs. The income the Related BD earns from Program Banks based on your balances in the FlexInsured Account program will in almost all circumstances be substantially greater than the amount of interest earned by you from those same balances in the FlexInsured Account program. The Related BD therefore has an incentive for your funds to be swept into the FlexInsured Account program rather than an alternative to the FlexInsured Account program.

The Related BD is ultimately responsible for setting its fees under the FlexInsured Account program. The Related BD receives a substantially higher percentage of the interest generated by deposit balances into the FlexInsured Account than if it were invested in money market mutual funds or bank deposits outside of the FlexInsured Account. For additional information regarding the FlexInsured Account Program, please visit [www.ceteraholdings.com](http://www.ceteraholdings.com).

Insured Deposit Sweep Account (IDSA) Program. The IDSA is the default sweep vehicle for advisory IRAs. For its services to support the IDSA Program, the Related BD receives a fixed per account fee each month from participating banks. Within each month, the amount of compensation paid to the Related BD under the IDSA Program does not vary among IDSA Program participants and is not affected by the amounts deposited through the IDSA Program including Your IDSA program deposits but will vary from month to month based on the federal funds target rate, actual number of days in the particular month, and the average aggregate daily balance in the IDSA Program. As a result, from one month to the next, even in an increasing interest rate environment, and/or even if the assets in Your account increase or remain the same (or decrease), the interest rate payment to you could decrease. Such a decrease in the amount you receive in the IDSA Program could result from the average aggregate daily balance in the IDSA Program decreasing.

The IDSA Program structure presents a conflict of interest because it generate fixed compensation for the Related BD even when the lower average aggregate daily balance decrease the amount of interest that clients receive. Depending on certain market environments or circumstances, the Related BD benefits from higher total amounts deposited across all participants in the IDSA Program. The monthly per account fee paid to the Related BD under the IDSA Program is based on a fee schedule that is available at the link provided at the bottom of this section. Although it is generally anticipated that the Related BD's fee under the IDSA Program will be offset by amounts paid by the Program Bank, the Related BD reserves the right to withdraw the monthly account fee, or a portion thereof, from the participants' accounts in the event that the amount received from the Program Banks and paid over to the Related BD is less than the firm's fee for the same period.

Program Banks do not have a duty to offer the highest rates of return available or comparable to those offered in money market funds. The FDIC-Insured Programs should not be viewed as an investment nor as a long-term holding. If you desire to maintain a cash position in your account for an extended period of time awaiting investment and/or seek the highest yields currently available in the market for your cash balances, the you should contact your advisor about your options outside the FDIC-Insured Programs. For additional information regarding the IDSA Program, please visit [www.ceteraholdings.com](http://www.ceteraholdings.com).

Money Market Mutual Fund. Some non-retirement account utilize a money market mutual fund designated as an alternative or excess sweep product for non-retirement accounts (Alternate MMF). The Related BD receives distribution assistance in the form of annual compensation of up to 92 basis points (0.92%) for assets held in an Alternate MMF.

For ERISA Title I (e.g. 401k) advisory accounts, the Related BD offers a money market mutual fund, which aims to provide a return on your account balances, such as the cash sweep product. The firm, advisor and Related BD do not receive any sweep-related compensation in connection with cash in ERISA Title I

advisory accounts that are swept into any money market mutual fund that the Related BD designates for the ERISA Title I advisory accounts.

The compensation that the Related BD receives from the FDIC-Insured Programs and the Alternate MMFs defrays its cost of providing and administering these sweep programs and is also a source of revenue. This compensation that the Related BD receives, presents a conflict of interest to the Firm because the Related BD receives a greater financial benefit when cash is swept into the FDIC-Insured Programs and the Alternate MMFs than it otherwise would if Your cash balance is held elsewhere, and any compensation the Related BD receives reduces the interest You receive. This compensation is retained by the Related BD and is not shared with Your Advisor, so Your Advisor does not have an additional financial incentive that is tied to the compensation from the cash sweep program to recommend that cash be held in the FDIC-Insured Programs or an Alternate MMF rather than investing in securities. The asset-based fee charged in Your advisory account includes cash held in the cash sweep program.

A money market mutual fund, unlike a Program Bank deposit, is not insured or guaranteed by the FDIC or any other governmental agency, and it is possible to lose money in a money market mutual fund. The Alternate MMFs, money market mutual funds held in ERISA Title I advisory accounts, and uninvested cash held by the Firm as a “free credit balance” in all Client accounts are covered by SIPC, a non-profit, non-government membership corporation, funded by member broker-dealers. SIPC’s coverage protects against the custodial risk (not a decline in market value) when a brokerage firm fails by replacing missing securities and cash up to a limit of \$500,000 of which \$250,000 may be in cash per client in each separate capacity under SIPC rules.

A money market mutual fund generally seeks to achieve a competitive rate of return (less fees and expense) consistent with its investment objective(s), which can be found in the fund’s prospectus. Money market funds seek to preserve a net asset value of \$1.00, with excess earnings that are generated through interest on portfolio holdings distributed to investors in the form of dividend payments.

Average annual rates of return of the money market mutual fund offered as the cash sweep product have varied over time and have typically been higher than the interest rate paid on deposits to you through the FDIC-Insured Programs. Due to stressed market conditions (e.g. which causes the Federal Reserve Bank to purchase government securities from the market in order to lower interest rates and increase the money supply, also known as “quantitative easing”), however money market funds may not pay investors any excess dividends or distributions. Under severe market stress, a money market fund could fail to preserve a net asset value of \$1.00 and/or could no longer be a viable business for the fund sponsor, which could force the sponsor to liquidate. As a result of any of these factors, it is possible to lose money in a money market fund. The Related BD will earn more money by designating FlexInsured

or the IDSA as the default sweep for eligible accounts. Accordingly, the Related BD has a financial incentive, and the Related BD and firm has a conflict of interest in selecting automatic cash sweep programs.

For detailed information regarding the terms and conditions of the cash sweep programs, see the Related BD's FlexInsured Account program disclosure statement at [www.ceteraholdings.com](http://www.ceteraholdings.com), or the applicable money market mutual fund prospectus. You can obtain copies of such product disclosures from your advisor. Generally, each account will be eligible for a single cash sweep program, such as an FDIC-Insured Program or a money market mutual fund, based on account type. The Related BD can change the program and/or products available. Your advisor can provide a current list of available options.

#### E. Compensation from Strategic Partners

Strategic Partners pay extra compensation to our affiliates when our affiliates serve as a broker-dealer and/or custodian, in addition to the usual product compensation described in the applicable prospectus. The additional amounts that Strategic Partners pay our affiliates vary from one Strategic Partner to another and from year to year. Some Strategic Partners pay our affiliates up to 45 basis points (0.45%) of your total purchase amount of a mutual fund or variable product. So, for example, if you invest \$10,000 in a mutual fund, we or our affiliates could be paid up to \$45. Additionally, some Strategic Partners make a quarterly payment or additional quarterly payment based on the assets you hold in the fund or variable insurance product over a period of time of up to 15 basis points (0.15%) per year. For example, on a holding of \$10,000, our affiliates could receive up to \$15.

Alternatively, our affiliates could receive compensation from the mutual fund or insurance company as: 1) a flat fee regardless of the amount of new sales or assets held in client accounts; or 2) the greater of such flat fee or amount based on assets and/or new sales as referenced above and any ticket charge payments referenced below. These payments are designed to compensate our affiliates for ongoing marketing and administration, and education of the advisors and employees. You do not make these payments. They are paid by the mutual fund and insurance companies and/or their affiliates out of the assets or earnings of the funds or insurance companies or their affiliates.

It is important to note that you do not pay more to purchase Strategic Partner mutual funds or insurance products through our affiliates than You would pay to purchase those products through another broker-dealer, and Your Advisor does not receive additional monetary compensation for selling a Strategic Partner product.

Although most of the Strategic Partners overlap across affiliates, there can be some variations. our affiliates also receive revenue sharing payments from companies that are not Strategic Partners.

### Conflicts of Interest in Receiving Revenue Sharing from Strategic Partners

A conflict of interest exists in that our affiliates are paid more revenue-sharing fees if you purchase one type of product instead of another and/or you purchase a product from one particular sponsor instead of another. Your advisor also indirectly benefits from Strategic Partner payments when the money is used to support costs relating to, but limited to, product review, marketing or training, or for waiver of ticket charges, as described below. Advisors do not receive additional monetary compensation associated with the revenue-sharing payments.

### Mutual Fund Ticket Charges

When you purchase a mutual fund of a Strategic Partner in a brokerage account, our affiliated broker-dealer may absorb the nominal “ticket charge” which will vary by broker-dealer, custodian and/or mutual fund product sponsor. Generally, the mutual fund families that participate in the Strategic Partner Program subsidize some of these ticket charges through the compensation mentioned above or by paying our affiliated broker-dealer a per trade fee of up to \$10. The type of transaction in a Strategic Partner mutual fund purchase that qualifies for a ticket charge waiver varies depending on the particular Strategic Partner. In general, the purchase of certain mutual fund in an amount of \$2,500 or more, except in the case of CIS where the amount is \$5,000 or more. Every mutual fund offered can be purchased without a ticket charge by processing the transaction with a check and an application sent directly to the mutual fund company. We believe that these ticket charge waivers do not result in a conflict of interest between you and your advisor.

### Training and Education Compensation

The advisors and our affiliates receive additional compensation from mutual fund and insurance companies, including Strategic Partners, that is not related to individual transactions or assets held in accounts. This money is paid, in accordance with regulatory rules to offset up to \$100 of the costs of training and education of our advisors, affiliates and employees. In some instances, mutual fund and insurance companies pay a flat fee in order to participate in our training and educational meetings. These meetings or events provide our advisors, affiliates, and employees with comprehensive information on products, sales materials, client support services, industry trends, practice management education and sales ideas.

It is important to note that due to the number of mutual fund and variable insurance products we and our affiliates offer, not all product sponsors have the opportunity to participate in these training and educational events. In general, our Strategic Partners have greater access to participation in these events and therefore greater access to, and opportunity to build relationships with, our advisors, affiliates and employees.

Some of the training and educational meetings for which We, Our affiliates, or Our advisors receive

reimbursement of costs include Client attendance. If You attend a training or educational meeting with Your Advisor and a product sponsor is present, You should assume that the product sponsor has paid for all or a portion of the costs of the meeting or event.

#### Other Cash and Non-Cash Compensation

In addition to reimbursement of training and educational meeting costs, we, our affiliates and our advisors receive promotional items, meal and/or entertainment or other non-cash compensation from representatives of mutual fund companies, insurance companies and direct participation sponsors, as permitted by regulatory rules. The sale of mutual funds, variable insurance products and other products whether of our Strategic Partners or not, could qualify advisors for additional business support and for attendance at seminars, conferences and entertainment events. Further some of our affiliate's home-office management and certain other employees receive a portion of their employment compensation based on sales of Strategic Partners.

#### List of Strategic Partners

The following is the list of revenue Strategic Partners.

##### Mutual Fund Companies:

- Amundi Pioneer
- Aristotle
- Blackrock
- Calvert
- Cantor Fitzgerald
- Capital Group<sup>1</sup>
- Columbia Threadneedle
- DWS Securities
- Eaton Vance
- Federated Hermes
- Fidelity Investments<sup>2</sup>
- Franklin Templeton
- Goldman Sachs
- Invesco
- John Hancock
- J.P. Morgan
- Lord Abbett
- Morgan Stanley
- New York Life Mainstay
- PGIM
- PIMCO
- Sammons Finance Group
- Transamerica Mutual Funds
- T. Rowe Price
- Voya Investments

<sup>1</sup>For American Funds (Capital Group), the ticket charges are waived for purchases over \$5,000 except through CIS where it is waived for purchases over \$10,000.

<sup>2</sup>For Fidelity Investments, ticket charges are waived on Fidelity Advisor Funds. Fidelity Direct Funds are not included in this program. Please note that fee waivers do not apply on ERISA Title I Advisory accounts where the advisor is paying the ticket charges.

##### Annuity Carriers:

- Allianz
- American National
- Athene
- Mass Mutual Ascend
- Nationwide
- New York Life Insurance Annuity

- Brighthouse
- Corebridge Financial
- Delaware Life
- Eagle Life
- Equitable
- Fidelity and Guarantee Life
- Global Atlantic
- Jackson
- Lincoln
- Mass Mutual
- Pacific Life
- Protective Life
- Prudential
- Sammons Financial Group
- Securian
- Security Benefit
- Symetra
- The Standard
- Transamerica
- TruStage

#### *Exchange Traded Products Partner Program*

Exchange traded products partner program (ETP Partner Program), which as described below, has similar features to our affiliate's Strategic Partner Program. Our affiliates have entered into agreements with the ETP Partners listed below and intend to add additional ETP Partners on an ongoing basis. For the most currently list of ETP Partners, please refer to [www.ceteraholdings.com](http://www.ceteraholdings.com)

Although our affiliates offer thousands of ETPs, a concentration of marketing and training efforts is placed on those investments offered by ETP Partners. An ETP Partner is selected, in part, based on the competitiveness of its products, its technology, its customer service and its training capabilities. An ETP Partner has greater exposure to our advisors (e.g. at conferences), and more opportunities to market and educate our advisors on investments and the products they offer.

An ETP Partner pays extra compensation to our affiliates in addition to the compensation described in the prospectus. The additional amounts may vary from one ETP Partner to another and from year to year. In general, an ETP Partner pays our affiliates the greater of an annual flat fee regardless of the amount of new sales or assets held in client accounts or up to 25 basis points (0.25%) of the ETP's net expense ratio (as set forth in the prospectus or supplement) of your investment's average daily balance during the quarter. So, for example, for each \$10,000 average quarterly daily balance of an ETP Partner's product held by our clients, our affiliates would be paid up to \$25 on an annual basis. Further, if the annual flat fee were \$500,000 and the total asset-based fee did not reach that amount our affiliates would still be paid \$500,000.

These payments constitute compensation to our affiliates. The payments are paid by the ETP Partner and/or their affiliates out of the assets or earnings of the ETP Partner or affiliates. You do not pay more to purchase an ETP Partner's product than you would pay outside of the ETP Partner Program, and your advisor does not receive additional compensation for selling an ETP Partner product. For the most current description of the compensation received from an ETP Partner, please refer to [www.ceteraholdings.com](http://www.ceteraholdings.com).

*Conflicts of Interest in Receiving Revenue Sharing from ETP Partners and with Ticket Charge Waivers*

A conflict of interest exists in the recommendation of ETP Partner products since our affiliates receive additional revenue if you purchase an ETP Partner product and/or if you purchase a product from one particular sponsor instead of another. Your advisor also indirectly benefits from ETP Partner payments when the money is used to support costs relating to, but not limited to, product review, marketing or training, or for waiver of ticket charges, as described below. Our advisors do not receive any monetary compensation associated with the revenue sharing payments.

When you purchase an ETP Partner product (except Putnam), our affiliated broker-dealer absorbs the nominal “ticket charge” for each transaction. In general, the ticket charge will be waived for the purchase of certain ETPs in an amount of \$2,500 or more, except in the case of CIS where the amount is \$5,000 or more.

*List of Exchange Traded Products Partners*

- Blackrock
- Capital Group
- Federated Hermes
- Fidelity Investments
- Franklin Templeton
- First Trust Advisors L.P.
- Global X
- J.P. Morgan
- New York Life Mainstay
- Pacer
- T. Rowe Price
- WisdomTree Asset Management

**ITEM 15 – Custody**

We are considered to have custody of your funds, even though Schwab, IWS, CIS, NFS and/or Pershing maintain those assets as the qualified custodian. You retain ownership of all cash, securities and other instruments in your account.

Schwab, IWS, CIS, NFS and/or Pershing, as applicable, will send your account statements, which you should carefully review. The firm relies on the applicable custodian to price and value assets and provide cost basis information for tax reporting of client assets. You should contact the applicable custodian for the cost basis accounting information provided on your custodial account statement for tax reporting purposes.

Schwab’s mailing address is:  
Charles Schwab & Co., Inc  
2423 East Lincoln Drive  
Phoenix, AZ 85016

CIS’ mailing address is:  
Cetera Investment Services  
400 First St., Suite 300  
St. Cloud, MN 56302

Pershing’s mailing address is:  
Pershing LLC  
One Pershing Plaza  
Jersey City, NJ 07399

NFS' mailing address is:  
National Financial Services LLC  
200 Seaport Blvd  
Boston, MA 02210

IWS' mailing address is:  
Fidelity Investments  
100 Crosby Parkway  
Covington, KY 41015

The Retirement Planning Group is deemed to have custody of client funds or securities when authorization has been provided by the client to deduct advisory fees from the client's accounts or when the client has granted authority to disburse funds as requested by the client through a Standing Letter of Authorization. Clients can change or amend these instructions by submitting the request to The Retirement Planning Group in writing. The Retirement Planning Group also offers bookkeeping and accounting services where the firm will pay bills on behalf of clients. This arrangement is also a form of custody.

For accounts which the firm is deemed to have custody of, other than the ability to deduct advisory fees, we have engaged an independent public accounting firm, not affiliated with The Retirement Planning Group, to perform an annual surprise custody audit performed by an unaffiliated PCAOB registered public accounting firm. The purpose of such examination is to verify that the funds and securities exist and are held with a qualified custodian.

#### *Related Custody Issues*

We do not maintain custody of your assets that we manage. However, in limited cases a member of our firm may serve as trustee, or be designated to be a successor trustee, for a family member's or other personal relationship of a trust account managed by our firm. These arrangements have potential to create a conflict of interest. In such cases, these arrangements must be approved by firm management and our CCO monitors the activity in such trusts as an additional safeguard against improper activity. Associates of TRPG are not permitted to serve as a trustee, or be designated to be a successor trustee, for a client's account in which there is not a family or other personal relationship.

#### **Item 16 – Investment Discretion**

We have discretionary authority to manage securities on the majority of accounts we manage for our clients. In these relationships we do not need to obtain specific prior consent from a client to trade securities. We prefer to hold discretionary authority to manage securities in clients' accounts. We may from time to time, however accept non-discretionary engagements where we do not have discretionary authority but instead must obtain specific prior consent from you before we trade securities.

In the management relationships where we have discretionary authority, this authority is found in the Investment Management Agreement. This agreement is signed by our clients and their advisor at the

beginning of our relationship. This agreement contains a limited power of attorney which gives us a limited scope authority to act on your behalf with your accounts. Further, the custodian on your accounts requires each account holder to indicate delegation of discretionary authority on each account application.

**Item 17 – Voting Client Securities**

We do not have, and will not accept, authority to vote client securities. We do not direct clients to vote in a particular way in a solicitation to vote. Clients will receive proxies and other solicitations to vote directly from the custodian, or transfer agent, as appropriate. Clients can contact their advisor to discuss their opportunity to vote. Ultimately voting decisions are the responsibility of the client.

**Item 18 – Financial Information**

This section contains specialized financial information required by law.

Details of Prepayment of Client Fees. We do not take prepayment of more than \$1,200 in fees and six months or more in advance, nor does the firm have a financial condition that could impair our ability to meet our contractual obligations. Therefore, we are not required to provide our audited balance sheets.

<b>FACTS</b>	<b>WHAT DOES THE RETIREMENT PLANNING GROUP, LLC (“TRPG”) DO WITH YOUR PERSONAL INFORMATION?</b>
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<b>Why?</b>	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some, but not all, sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
<b>What?</b>	The types of personal information we collect and share depend on the product or service you have with us. This information can include: <ul style="list-style-type: none"> <li>▪ social security number and birth date</li> <li>▪ income, assets, net worth and investment experience</li> <li>▪ account balances and transaction history</li> </ul>
<b>How?</b>	All financial companies need to share customers’ personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers’ personal information; the reasons TRPG chooses to share; and whether you can limit this sharing.

Reasons We May Share Your Personal Information	Does TRPG share?	Can you limit this sharing?
<b>For our everyday business purposes –</b> to process transactions and maintain your account(s), respond to court orders or legal investigations, or report to credit bureaus	Yes	No
<b>For our marketing purposes –</b> to offer our products and services to you	Yes	No
<b>For joint marketing with other financial companies</b>	No	We don’t share
<b>For our affiliates’ everyday business purposes –</b> information about your transactions and experiences	Yes	No
<b>For our affiliates’ everyday business purposes –</b> information about your creditworthiness	No	We don’t share
<b>For our affiliates to market to you</b>	Yes	Yes
<b>For nonaffiliates to market to you</b> In certain circumstances, if your financial professional is not under a restrictive covenant and leaves TRPG to join another firm, we or your financial professional may disclose your personal information to the new firm.	Yes	Yes

<b>To limit our sharing</b>	<p>Please note:</p> <p>If you are a new customer, we can begin sharing your information 30 days from the date we sent this notice. When you are no longer our customer, we continue to share your information as described in this notice.</p> <p>However, you can contact us at any time to limit sharing.</p>
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<b>Questions?</b>	Call 913-498-8898 or visit <a href="http://www.planningretirements.com">www.planningretirements.com</a>
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<b>Who We Are</b>	
<b>Who is providing this notice?</b>	The Retirement Planning Group, LLC
<b>What We Do</b>	
<b>How does TRPG protect my personal information?</b>	<p>To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.</p> <ul style="list-style-type: none"> <li>In addition to physical and electronic safeguards, we have implemented security standards and procedures to protect your information, including employee training, limited employee access and the use of confidentiality agreements.</li> </ul>
<b>How does TRPG collect my personal information?</b>	<p>We collect your personal information, for example, when you:</p> <ul style="list-style-type: none"> <li>open an account or deposit money</li> <li>direct us to buy or sell securities</li> <li>seek advice about your investments or enter into an investment advisory contract</li> </ul> <p>We also collect your personal information from other companies.</p>
<b>Why can't I limit all sharing?</b>	<p>Federal law gives you the right to limit only:</p> <ul style="list-style-type: none"> <li>sharing for affiliates' everyday business purposes – information about your creditworthiness</li> <li>affiliates from using your information to market to you</li> <li>sharing for nonaffiliates to market to you</li> </ul> <p><b>State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.</b></p>
<b>What happens when I limit sharing for an account I hold jointly with someone else?</b>	Your choices will apply to everyone on your account.
<b>Definitions</b>	
<b>Affiliates</b>	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li><i>Our affiliates include companies with a Cetera or Avantax name.</i></li> </ul>
<b>Nonaffiliates</b>	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li><i>Nonaffiliates may include financial services companies.</i></li> </ul>
<b>Joint Marketing</b>	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> <li><i>The Retirement Planning Group does not jointly market.</i></li> </ul>
<b>Other Important Information</b>	
<ul style="list-style-type: none"> <li>Accounts with a California, Vermont, Massachusetts, or North Dakota mailing address are automatically treated as if they have limited the sharing as described on page 1.</li> <li><b>Nevada residents:</b> Pursuant to Nevada law, you may request to be placed on our internal "Do Not Call" list at any time by calling 913-498-8898 or emailing us at <a href="mailto:contacttrpg@planningretirements.com">contacttrpg@planningretirements.com</a>. You may obtain further information by contacting the Nevada Attorney General, 555 E. Washington Ave., Suite 3900, Las Vegas, NV 89101; phone 702-486-3132; email <a href="mailto:bcpserv@ag.nv.gov">bcpserv@ag.nv.gov</a>.</li> </ul>	