



Form ADV Part 2 – Disclosure Brochure
April 9, 2024

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This brochure provides information about the qualifications and business practices of Spartan Planning. If you have any questions about the contents of this brochure, please contact us at **800.371.1292** or hello@SpartanPlanningGroup.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Additional information about Spartan Planning also is available on the SEC's website at www.adviserinfo.sec.gov. Our CRD # is 166599

Item 2 Summary of Material Changes

Since our last annual updating amendment dated, March 16, 2023, we have the following material changes to report:

- We are advising for new household clients we are charging a 0.1% technology fee on Held Away Accounts we manage to offset the cost of our held away trading system.

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Item 4 Advisory Business

Spartan Planning & Wealth Management, LLC ("Spartan Planning") dba Spartan Planning Group is a registered investment advisor based in Greensboro, NC. Spartan Planning was formed in Jan 2013 as a Limited Liability Company under the laws of the State of North Carolina that conducts business in North Carolina and other states. The majority stake in Spartan Planning is owned by David Childs, CFP®. Other minority owners include Ira Ross, Jon Robinson and Brandon Langley.

Spartan Planning is a financial planning and wealth management firm, offering integrated financial planning and asset management services. Spartan Planning has developed a client service model that includes discovery, implementation, as well as monitoring progress of clients engaged with Spartan Planning.

The investment advice provided by Spartan Planning focuses on the individual needs of each client, household or business. Through questionnaires, gathering of documents from the client and conversations and depending on the stated objectives of the relationship, Spartan Planning will review some or all of the following: the client's personal situation and circumstances and individual objectives, risk tolerance, time horizon, liquidity needs, constraints, growth and income needs and expectations as well as estate tax and income tax considerations.

Clients may request reasonable restrictions on investing in certain securities, types of securities, or industry sectors

We strongly believe in all six of the core steps to quality financial planning laid out by the Certified Financial Planning Board of Standards. Those are:

Financial Planning Process:

1. Establish and defining the client-planner relationship
2. Gather client information and data, including goals
3. Analyzing and evaluating your financial status
4. Developing and presenting financial planning recommendations and possible alternatives
5. Implementing the financial planning recommendations
6. Monitoring the status and progress of the implemented financial planning recommendations

Perhaps the most important parts to this "planning" process are these final two steps that many people overlook. A "plan" presentation is only a snapshot in time and is similar to a "flight plan" before a plane takes off. The pilot knows where they are and he knows where he needs to land but he doesn't yet know what the 1,000 mid-course corrections will be over the 3,000 mile flight.

Similarly, our clients look to us to help guide them through this entire "flight path" of their life.

Our Principles:

1. Clients will always have their interests put first. Our recommendations will be simple to understand and straight forward
 - a. We are Fee-Only and do not sell any products.
2. We are disciplined and restrained in our approach to investing.

Portfolio Management Services

We offer discretionary portfolio management services. Our investment advice is tailored to meet our clients' needs and investment objectives as noted above. As part of our process we utilize internal models to assist in developing client portfolio asset allocations base upon a client's personal situation and circumstances and individual objectives, risk tolerance, time horizon, and liquidity needs.

If you participate in our discretionary portfolio management services, we require you to grant our firm discretionary authority to manage your account. Discretionary authorization will allow us to determine the specific securities, and the amount of securities, to be purchased or sold for your account without your approval prior to each transaction. Discretionary authority is typically granted by the investment advisory agreement you sign with our firm and the appropriate trading authorization forms.

You may limit our discretionary authority (for example, limiting the types of securities that can be purchased or sold for your account) by providing our firm with your restrictions and guidelines in writing.

We may also offer non-discretionary portfolio management services. If you enter into non-discretionary arrangements with our firm, we must obtain your approval prior to executing any transactions on behalf of your account. You have an unrestricted right to decline to implement any advice provided by our firm on a non-discretionary basis.

As part of our portfolio management services, we may use one or more sub-advisers to manage a portion of your account on a discretionary basis. The sub-adviser(s) may use one or more of their model portfolios to manage your account. We will regularly monitor the performance of your accounts managed by sub-adviser(s), and may hire and fire any sub-adviser without your prior approval. We may pay a portion of our advisory fee to the sub-adviser(s) we use; however, you will not pay our firm a higher advisory fee as a result of any sub-advisory relationships.

Pension Consulting Services

We offer pension consulting services to employee benefit plans and their fiduciaries based upon the needs of the plan and the services requested by the plan sponsor or named fiduciary. In general, these services may include an existing plan review and analysis, plan-level advice regarding fund selection and investment options, education services to plan participants, investment performance monitoring, and/or ongoing consulting. These pension consulting services will generally be non-discretionary and advisory in nature. The ultimate decision to act on behalf of the plan shall remain with the plan sponsor or other named fiduciary.

We may also assist with participant enrollment meetings and provide investment-related educational seminars to plan participants on such topics as:

- Diversification;
- Asset allocation;
- Risk tolerance; and
- Time horizon

We may also provide additional types of pension consulting services to plans on an individually negotiated basis. All services, whether discussed above or customized for the plan based upon requirements from the plan fiduciaries (which may include additional plan-level or participant-level services) shall be detailed in a written agreement and be consistent with the parameters set forth in the plan documents.

Either party to the pension consulting agreement may terminate the agreement upon written notice to the other party in accordance with the terms of the agreement for services. The pension consulting fees will be prorated for the quarter in which the termination notice is given and any unearned fees will be refunded to the client.

Types of Investments

We primarily offer advice on ETF Mutual fund and equity securities. Refer to the *Methods of Analysis, Investment Strategies and Risk of Loss* below for additional disclosures on this topic.

Additionally, we may advise you on various types of investments based on your stated goals and objectives. We may also provide advice on any type of investment held in your portfolio at the inception of our advisory relationship.

Since our investment strategies and advice are based on each client's specific financial situation, the investment advice we provide to you may be different or conflicting with the advice we give to other clients regarding the same security or investment.

IRA Rollover Recommendations

Effective December 20, 2021 (or such later date as the US Department of Labor ("DOL") Field Assistance Bulletin 2018-02 ceases to be in effect), for purposes of complying with the DOL's Prohibited Transaction Exemption 2020-02 ("PTE 2020-02") where applicable, we are providing the following acknowledgment to you.

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

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

If we do not already manage your retirement plan through our engagement, we will benefit financially from the rollover of your assets to an account we manage. These assets increase our assets under management and, in turn, our advisory fee. As a fiduciary, we only recommend a rollover when we believe it is in your best interest.

As of December 31, 2023, Spartan Planning & Wealth Management, LLC continuously manages \$132,486,729 on a discretionary basis, \$147,174,495 on a non-discretionary basis.

Item 5 Fees and Compensation

Portfolio Management Services

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

Wealth Management Fee Schedule:

Assets Under Management	Annual Fee
First \$1,000,000	1.25%
Between \$1,000,001-3,000,000	0.95%
Between \$3,000,001-5,000,000	0.75%
Assets Over \$5,000,000	0.55%

Minimum annual fee = \$6,000

Fees are billed quarterly in advance.

Held away (company plan) accounts additionally have a 0.10% fee

We do not require nor solicit payment of Wealth Management fees for more than four (4) months in advance. Upon engagement Spartan Planning will invoice for the prorated first quarter of fees. When available, and after first payment of fees, Spartan Planning will automatically deduct fees from client accounts. If direct deduction of fees is not initiated and/or not available, Spartan Planning will invoice the client to pay outstanding fees within 30 days of receipt of invoice. We will deduct our advisory fee only when you have given our firm written authorization permitting the fees to be paid directly from your account. Further, the qualified custodian will deliver an account statement to you at least quarterly. These account statements will show all disbursements from your account. You should review all statements for accuracy.

We encourage you to reconcile our invoices with the statement(s) you receive from the qualified custodian. If you find any inconsistent information between our invoice and the statement(s) you receive from the qualified custodian call our main office number located on the cover page of this brochure.

Initial Wealth Management fees are based on the value of accounts on the date of first transfer. Thereafter, fees will be based on the value of the accounts on the last day of each quarter. Certain fees may be negotiable depending on existing/past relationship or if a client has become a widow. In the event a client / prospect is widowed and after a full review of the widowed client / prospect circumstances, Spartan will waive some of the fees associated with wealth management services and with providing financial planning services. The fees waived are associated with the first \$250,000 of AUM managed by Spartan.

You may terminate the portfolio management agreement upon 30 days written notice. You will incur a pro rata charge for services rendered prior to the termination of the portfolio management agreement, which means you will incur advisory fees only in proportion to the number of days in the quarter for which you are a client. If you have pre-paid advisory fees that we have not yet earned, you will receive a prorated refund of those fees.

401k Plan Management:

Spartan charges a % of assets under management for 401k plan management, just as we do for non-company-plan assets. That fee varies according to our regular fee schedule. We charge a 0.10% (10 basis point annually) "held away account fee" on these company plan assets. We use Pontera, a third-party platform, to facilitate management of held-away assets such as defined contribution plan participant accounts, with discretion. The platform allows us to avoid being considered to have custody of client funds since we do not have direct access to client log-in credentials to affect trades. We are not affiliated with the platform in any way and receive no compensation from them for using their platform. A link will be provided to the client allowing them to connect an account(s) to the platform. Once client account(s) is connected to the platform, we will review the current account allocations. When deemed necessary, we will rebalance the account considering client investment goals and risk tolerance, and any change in allocations will consider current economic and market trends. The goal is to improve account performance over time, minimize loss during difficult markets, and manage internal fees that harm account performance. Client account(s) will be reviewed at least quarterly and allocation changes will be made as deemed necessary."

Account Fees:

For combined households under \$250,000 in value there will be a \$4/month charge per account.

For new household clients we are charging a 0.1% technology fee on Held Away Accounts we manage to offset the cost of our held away trading system.

Financial Planning Fees/Rates:

Spartan Planning may, depending on the complexity of the engagement and services rendered, charge a financial planning fee (typically from \$1,500-\$5,000) for the initial comprehensive financial plan provided as a stand-alone plan or as part of our Wealth Management services. As noted above in Wealth Management Fee Schedule, in the event a client / prospect is widowed and after a full review of the widowed client / prospect circumstances, Spartan will waive the fee associated with the first \$250,000 of AUM managed by Spartan.

If an agreement to use Spartan Planning's Wealth Management services is terminated by the client, 30-days written notice will be required to establish the effective termination date of the agreement. Any prepaid, unearned fees are prorated and will be refunded.

Spartan Planning, in its sole discretion, may terminate a client agreement at any time for any reason including, but not limited to: a client refusing to provide or concealing pertinent information about financial information, a relationship that isn't mutually beneficial.

Other Fees & Expenses

All fees paid to Spartan Planning are separate and distinct from the fees and expenses charged by mutual funds and/or ETFs to their shareholders as well as fees and expenses charged by custodians and/or broker/dealers. These fees and expenses are described in each prospectus (in the case of custodian fees can generally be found on corresponding custodian's website and fee disclosure) will generally include a management fee, as well as other fees and expenses. Performance fees quoted by mutual fund companies are net of the deduction of their fees. Please refer to the "Brokerage Practices" section (Item 12) of this brochure for additional information on this topic.

Spartan Planning does not receive commissions or any compensation for making transactions in any Client account. As a Fee-Only advisor, Spartan Planning is paid exclusively by the Client (or the Client's representative) and not by any third party.

Household AUM Fees:

Households with a combined investment value under \$500,000 will be charged an additional fee of 0.25%. The quarter following your household reaching over \$500,000 this fee adjustment will be removed.

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

Spartan Planning does not charge performance based fees and has no financial incentive to recommend any particular investment options for its clients.

Item 7 Types of Clients

Spartan Planning may provide services to a variety of Client types. Typical clients are individuals, small businesses, trusts and estates with investable assets between \$500,000 and \$10,000,000. Spartan Planning, in its sole discretion, may waive an account minimum based upon certain criteria including, but not limited to, future expected savings, related accounts, and pro-bono activities.

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

The analysis and Investment Strategies utilized by the Adviser may vary significantly depending on the needs of a particular client, but all of the Adviser's recommendations are likely to be rooted in one or more of the following principles.

- Risk Profile - target the appropriate balance of risk and return to meet the needs of the client;
- Macro Direction - determine path and strength of overall markets and sectors (i.e., US/Foreign stocks, bonds, commodities, etc.);
- Micro Direction - determine path and strength of individual funds and securities;
- Volatility/Volume - determine stability and breadth of a particular directional move;
- Correlation - determine the relationship of a given sector/instrument to other investments held by the client; and/or
- Diversification - evaluate the appropriate allocation to various instruments to meet the client's risk profile.

Investing in securities involves the risk of loss that clients should be prepared to bear.

Risks

The Adviser primarily invests its client's assets in ETFs and individual securities. However, we may advise on other types of investments as appropriate for you since each client has different needs and different tolerance for risk. Each type of security has its own unique set of risks associated with it and it would not be possible to list here all of the specific risks of every type of investment. Even within the same type of investment, risks can vary widely. However, in very general terms, the higher the anticipated return of an investment, the higher the risk of loss associated with the investment. Certain material risks to which the client's assets may be subject are discussed below.

Management Risks. While the Adviser manages client assets based on the Adviser's experience, research and proprietary methods, the value of client investment portfolios will change daily based on the performance of the underlying securities in which they are invested. Accordingly, client investment

portfolios are subject to the risk that the Adviser allocates assets to asset classes that are adversely affected by unanticipated market movements, and the risk that the Adviser's specific investment choices could underperform their relevant benchmarks.

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

ETFs may have tracking error risks. For example, the ETF investment adviser may not be able to cause the ETF's performance to match that of its Underlying Index or other benchmark, which may negatively affect the ETF's performance. In addition, for leveraged and inverse ETFs that seek to track the performance of their Underlying Indices or benchmarks on a daily basis, mathematical compounding may prevent the ETF from correlating with performance of its benchmark. In addition, an ETF may not have investment exposure to all of the securities included in its Underlying Index, or its weighting of investment exposure to such securities may vary from that of the Underlying Index. Some ETFs may invest in securities or financial instruments that are not included in the Underlying Index, but which are expected to yield similar performance.

Risks Related to Alternative Investment Vehicles. From time to time and as appropriate, the Adviser may invest a portion of a client's portfolio in alternative vehicles. The value of client portfolios will be based in part on the value of alternative investment vehicles in which they are invested, the success of each of which will depend heavily upon the efforts of their respective managers. When the investment objectives and strategies of a manager are out of favor in the market or a manager makes unsuccessful investment decisions, the alternative investment vehicles managed by the manager may lose money. A client account may lose a substantial percentage of its value if the investment objectives and strategies of many or most of the alternative investment vehicles in which it is invested are out of favor at the same time, or many or most of the managers make unsuccessful investment decisions at the same time.

Equity Market Risks. The Adviser may invest portions of client assets directly into equity investments, primarily stocks, funds that invest in stocks and other equity securities are nevertheless subject to the risks of the stock market. These risks include, without limitation, the risks that stock values will decline due to daily fluctuations in the markets, and that stock values will decline over longer periods (e.g., bear markets) due to general market declines in the stock prices for all companies, regardless of any individual security's prospects.

Fixed Income Risks. The Adviser may invest portions of client assets directly into fixed income instruments, such as bonds and notes, or may invest in pooled investment funds that invest in bonds and notes. While investing in fixed income instruments, either directly or through

pooled investment funds, is generally less volatile than investing in stock (equity) markets, fixed income investments nevertheless are subject to risks. These risks include, without limitation, interest rate risks (risks that changes in interest rates will devalue the investments), credit risks (risks of default by borrowers), or maturity risk (risks that bonds or notes will change value from the time of issuance to maturity).

Risks Associated with Electronic Trading or Order Routing Systems. Trading through an electronic trading or order routing system creates risks associated with system or component failure. In the event of system or component failure, the Adviser may not be able to enter new orders, execute existing orders, modify or cancel orders that were previously entered or determine the status of existing orders. This could result in financial losses to clients. The foregoing risks are just some of the most significant risks that may apply to a client's investments. Clients should understand that investing in any securities, involves a significant risk of loss of both income and principal and that they should be prepared to bear such losses. Investment safety and satisfactory performance is in no way guaranteed and no incremental protections are offered via an investment account with the Adviser.

Item 9 Disciplinary Information

Spartan Planning does not have any legal, regulatory or disciplinary acts or events to disclose about itself or any of its employees.

Item 10 Other Financial Industry Activities and Affiliations

We have not provided information on other financial industry activities and affiliations because we do not have any relationship or arrangement that is material to our advisory business or to our clients with any of the types of entities listed below.

1. broker-dealer, municipal securities dealer, or government securities dealer or broker;
2. investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund);
3. other investment adviser or financial planner;
4. futures commission merchant, commodity pool operator, or commodity trading adviser;
5. banking or thrift institution;
6. accountant or accounting firm;
7. lawyer or law firm;
8. insurance company or agency;
9. pension consultant;
10. real estate broker or dealer; and/or
11. sponsor or syndicator of limited partnerships.

Recommendation of Other Advisers

We recommend and use Blueprint as a sub-advisor to assist in the management of client portfolios. We will not receive separate compensation, directly or indirectly, from Blueprint for recommending that you use their services. Moreover, we do not have any other business relationships with Blueprint. Refer to the *Advisory Business* section above for additional disclosures on this topic.

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

The Code of Ethics adopted by Spartan Planning demands high ethical standards of business conduct by our employees and careful compliance with applicable federal securities laws. Our firm believes we have a duty to our clients to be loyal, fair, and act in good faith. Spartan Planning and our employees accept the obligation to adhere not only to the specific provisions of the Code of Ethics but to the general principles that form its foundation.

Our Code of Ethics includes policies and procedures for the review of monthly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by the firm's access persons. It requires the prior approval of any acquisition of securities in a limited offering (i.e. a private placement) or an initial public offering. The code also incorporates oversight, enforcement, and recordkeeping provisions.

Spartan Planning's Code of Ethics further includes the firm's policy prohibiting the use of material non-public information. While we do not believe that we have any particular access to non-public information, all employees are reminded that such information may not be used in a personal or professional capacity. A copy of our Code of Ethics is available to our advisory clients and prospective clients. You may request a copy by sending an email to david@spartanplanninggroup.com with subject matter "Please send me a copy of your Code of Ethics", or by calling 336.403.8946

Our Code of Ethics is designed to assure that the personal securities transactions, activities and interests of our employees will not interfere with (1) making decisions in the best interest of advisory clients and (2) implementing such decisions while, at the same time, allowing employees to invest for their own accounts.

Our firm and/or individuals associated with our firm may buy or sell for their personal accounts securities identical to or different from those recommended to our clients. In addition, any related person(s) may have an interest or position in a certain security which may also be recommended to a client. Because our employees' goals and risk tolerance may differ from those of our clients' goals and risk tolerances, our employees may invest in similar or different securities.

It is the expressed policy of our firm that no person employed by us may purchase or sell any security prior to a transaction(s) being implemented for an advisory account, thereby preventing such employee(s) from benefiting from transactions placed on behalf of advisory accounts. Any client who has trades placed by us at the same time as an employee purchases those same securities the client is entitled to the lower priced order received.

Item 12 Brokerage Practices

For discretionary clients, unless we receive specific written instructions from a client regarding the placement of brokerage business, Spartan Planning will determine or recommend the custodian to use. Spartan Planning evaluates, among the custodians it has access to, the firms in terms of several criteria including best execution abilities, trading costs, and level of service provided to our firm and our clients as well as other factors. The most important factor is giving clients the best execution price offset by trading costs. If our Client directs our firm to use a specific broker or dealer, we cannot guarantee best execution or any of these other factors.

As a matter of policy and practice, Spartan Planning may not block trade our client accounts and, therefore, may typically implement client transactions separately for each account. Due to this practice, certain client trades may be executed before or after others and, depending on the type of security traded, may be executed at a different price and/or commission rate. Additionally, Spartan Planning clients may not receive certain volume discounts which may be available to advisers that block client trades.

Spartan Planning may receive research products and/or software and/or services from certain brokerage firms. These products/services are often provided to investment adviser firms. These products/services may include items such as: industry related webinars, service and support staff, market analysis and research products and possibly a discounted rate to attend an industry conference.

Item 13 Review of Accounts

A. Frequency of Reviews

Wealth Management Clients:

While the underlying securities within our Clients' investment accounts are monitored continuously as needs arise, the actual client accounts are monitored and reviewed no less often than quarterly.

Wealth Management Clients will also often have Financial Planning services as part of their engagement. Financial Planning reviews may be more or less frequent depending on each Client's situation and financial circumstances. Wealth Management reviews are performed by David Childs, CFP®, Director of Wealth Management and/or Ira Ross and/or Eric Warren.

Financial Planning Only Clients:

Occasionally a client will engage us for "Financial Planning Only" services – sometimes with regular annual updates and sometimes on an "as needed basis". Although this is not our recommended path for management of a client's situation since a "plan" delivery only represents a "snapshot" at a point in time, we will sometimes honor this request to engage depending on the circumstances and reasons proposed by the client.

In the case of a one time or "as needed" planning engagement we will agree up front to how frequently to update the plan. Financial Planning reviews are performed by David Childs, CFP®, Director of Wealth Management and/or Eric Warren.

B. Triggers for Additional Reviews

More frequent reviews may be triggered by material changes in a number of variables. Among these are changes in the Client's individual circumstances, or on the changes in market, political, regulatory or other economic considerations.

C. Reports

The content included in a client's financial plan will vary according to the Client's individual needs. Subsequent updates to the plan will be reported to the client in various formats and methods, as dictated by each Client's individual circumstances.

In addition to the monthly or quarterly reports sent to Clients by the custodian (also referred to as broker/dealer elsewhere) Spartan Planning will send written performance reports at least annually to each client

Item 14 Client Referrals and Other Compensation

We do not receive any compensation from any third party in connection with providing investment advice to you nor do we compensate any individual or firm for client referrals.

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

Item 15 Custody

As paying agent for our firm, your independent custodian will directly debit your account(s) for the payment of our advisory fees. This ability to deduct our advisory fees from your accounts causes our firm to exercise limited custody over your funds or securities. We do not have physical custody of any of your funds and/or securities. Your funds and securities will be held with a bank, broker-dealer, or other qualified custodian. You will receive account statements from the qualified custodian(s) holding your funds and securities at least quarterly. The account statements from your custodian(s) will indicate the amount of our advisory fees deducted from your account(s) each billing period. You should carefully review account statements for accuracy.

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

Use of Client Log-in Credentials

Our firm or persons associated with our firm may be in possession of client log-on information to the client's investment accounts. In general, where our account access gives us the ability to control client funds and securities, we are deemed to have custody. We do not have physical custody of any of your funds and/or securities. Your funds and securities will be held with a bank, broker-dealer or other independent, qualified custodian.

As noted above in Item 5 Fees and Compensation, we use Pontera, a third party platform, to facilitate management of held away assets such as defined contribution plan participant accounts, with discretion. For the assets managed through Pontera, the platform allows us to avoid being considered to have custody of client funds since we do not have direct access to client log-in credentials to affect trades. We are not affiliated with the platform in any way and receive no compensation from them for using their platform.

Item 16 Investment Discretion

Spartan Planning is granted discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. Discretionary authority will be granted upon and evidenced by the Client's execution of an Advisory Agreement or equivalent authorization document.

Spartan Planning may, in its sole discretion, hire outside consultants and investment sub-advisors to help research and implement certain investment strategies. These consulting and sub-advisory services are provided at no additional cost to clients and are paid for out of Spartan Planning's general operating cash.

Item 17 Voting Client Securities

As a matter of firm policy, we do not vote proxies on behalf of clients. Therefore, although our firm may provide investment advisory services relative to client investment assets, clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets. Clients are responsible for instructing each custodian of the assets, to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets. Spartan Planning welcomes client questions in making these decisions.

Item 18 Financial Information

Under no circumstances does Spartan Planning require or solicit payment of fees more than six (6) months in advance of services rendered, and usually soliciting payment of fees no more than three (3) months in advance of services rendered.

Item 19 Personnel Responsible for Investment Advice

We are a federally registered investment adviser; therefore, we are not required to respond to this item.