

Item 1: Cover Page



Wrenne Financial Planning LLC

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Lexington, KY 40505

Form ADV Part 2A – Firm Brochure

859-538-6044

July 2, 2025

www.wrennefinancial.com

This Brochure provides information about the qualifications and business practices of Wrenne Financial Planning LLC, “WFP”. If you have any questions about the contents of this Brochure, please contact us at 859-538-6044. 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.

Wrenne Financial Planning LLC is registered as an Investment Adviser with the U.S Securities and Exchange Commission. Registration of an Investment Adviser does not imply any level of skill or training.

Additional information about WFP is available on the SEC’s website at www.adviserinfo.sec.gov which can be found using the firm’s identification number 173029.

Item 2: Material Changes

The following is a list of material changes made to this brochure since our last annual ADV Update on March 19, 2025:

- We no longer offer an online education platform providing general knowledge on financial planning and investing so have removed this service from Items 4 and 5. Our affiliate Finance for Physicians now offers this service.
- In Item 5, we have added language to clarify our fee review process. We will meet with clients at least every three (3) years to assess net worth and other parameters to determine if a fee change is appropriate.
- We have added information about Finance for Physicians to Item 14. This website and podcast are affiliated with WFP through common control and ownership.

Future Changes

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

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at <http://www.adviserinfo.sec.gov> by searching for our firm name or by our CRD number 173029.

You may also request a copy of this Disclosure Brochure at any time, by contacting us at 859-538-6044.

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Item 4: Advisory Business

Description of Advisory Firm

Wrenne Financial Planning LLC (“WFP”) is registered as a Registered Investment Adviser with the U.S. Securities and Exchange Commission. WFP was founded in August of 2014 and is principally owned by Daniel Wrenne. WFP manages \$231,316,219 in discretionary Regulatory Assets Under Management as of December 31st, 2024.

Types of Advisory Services

Combined Investment Management and Comprehensive Financial Planning Services

This combined service involves working one-on-one with a planner and implementing our recommendations in investment accounts. The planner will monitor the plan, recommend any changes, and ensure the plan is up to date. After the financial plan is completed, WFP works with clients to implement and monitor individually tailored investment portfolios.

As part of the onboarding process for these services, a client will be taken through establishing their goals and values around money. They will be required to provide information to help complete the following areas of analysis: net worth, cash flow, insurance, credit scores/reports, employee benefit, retirement planning, insurance, investments, college planning and estate planning, as well as prior investment history, risk tolerance, family composition and background. Once the client’s information is reviewed, WFP will build and analyze a financial plan, and then the findings, analysis and potential changes to their current situation will be reviewed with the client. The completion of the comprehensive financial plan will then lead to the creation of a personal investment policy or an investment plan with an asset allocation target.

Clients subscribing to this service will receive a written or an electronic report, providing the client with a detailed financial plan designed to achieve their stated financial goals and objectives.

On an annual basis there will be a full review of the client’s plan to ensure its accuracy and ongoing appropriateness. Any needed updates will be implemented at that time. Additional reviews will occur if the client indicates they had a material change in their previously reported circumstances that could impact their plan and investments.

WFP does not offer Comprehensive Financial Planning on a standalone basis.

Please note that pursuant to the client agreement you are obligated to notify us promptly when your financial situation, goals, objectives, or needs change.

WFP typically recommends investments in mutual funds and exchange-traded funds ("ETFs"). If clients currently own these or other investment types, WFP will review them during our initial meetings and will take them into account during the implementation of the selected investment strategy.

Under certain conditions, securities from outside accounts may be transferred into a client's account(s); however, WFP may recommend that a client sell any security if we believe that it is not suitable for the current recommended investment strategy. Additionally, trading may be required to meet initial allocation targets, after substantial cash deposits that require investment allocation, and/or after a request for a withdrawal that requires liquidation of a position.

Periodically, a client's account may need to be rebalanced or reallocated in order to reestablish the targeted percentages of the initial asset allocation. This rebalancing or reallocation will occur as required or pursuant to the schedule WFP has determined with the client.

Each client will be responsible for their respective tax consequences resulting from the sale of any security, rebalancing or reallocation of the account. Clients are responsible for any taxable events in these instances. WFP's investment professionals are not tax professionals and do not give tax advice. However, at a client's request we will work with a client's tax professionals to assist with tax planning.

Clients will be notified of any purchases or sales through trade confirmations and statements that are provided by the custodian. These statements list the total value of the account, itemize all transaction activity, and list the types, amounts, and total value of securities held. Each client will at all times maintain full and complete ownership rights to all assets held in their respective account(s), including the right to withdraw securities or cash, proxy voting and receiving transaction confirmations.

Student Loan Planning

Under our student loan planning service, we provide the following:

1. Creating Your Customized Student Loan Plan;
2. Organize your private and federal student loan details;
3. Clarify your personal, financial, and professional current position and future goals; and
4. Prepare custom repayment strategy considering your situation and options available, including Public Service Loan Forgiveness ("PSLF"), refinance, and consolidation.

Client Tailored Services and Client Imposed Restrictions

We offer the same suite of services to all our clients. However, specific client financial plans and their implementation are dependent upon the client's Investment Policy Statement which outlines each

client's current situation (income, tax levels, and risk tolerance levels) and is used to construct a client specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets.

WFP allows client directed restrictions. Clients limit our discretionary authority (e.g., limiting the types of securities that can be purchased or sold for your account) by providing WFP with restrictions and guidelines in writing.

Item 5: Fees and Compensation

Please note, unless a client has received the firm's disclosure brochure at least 48 hours prior to signing the investment advisory contract, the investment advisory contract may be terminated by the client within five (5) business days of signing the contract without incurring any advisory fees. Also, we do not require prepayment of more than \$1,200 in fees for any services more than six (6) months in advance of the provision of those services.

Combined Investment Management and Comprehensive Financial Planning

Combined Investment Management and Comprehensive Financial Planning consists of an upfront fee ranging from \$750 to \$3,000, depending on the complexity and needs of the client, and an ongoing fee ranging from \$1,200 to \$20,000 per year, depending on the complexity and needs of the client, that is paid either monthly or quarterly, in advance. At WFP's discretion, we may offer discounted fees to medical residents and fellows. We will meet with clients at least every three (3) years to assess net worth and other parameters to determine if a fee change is appropriate. We do not have a minimum investment account size. Factors considered in setting the client fee are number of household members, amount of financial planning necessary, number and type of accounts, net worth, life circumstances, business interests, etc. This service may be terminated with 30 days' written notice. Upon termination of any account, the fee will be prorated, and any unearned fee will be refunded to the client based on the amount of time remaining in the billing period.

Please note that our ongoing fee schedule is subject to a standard 4% annual increase applied as of the beginning of the first billing period following each anniversary of the Effective Date.

Fees may be assessed pro rata when services begin after the first day of the billing period. WFP will either invoice clients directly for services or payment of fees will be deducted by the qualified custodian holding client funds.

Student Loan Planning

The fee for student loan planning services includes a one-time engagement fee of \$500 per analysis for a single borrower and \$750 per analysis for dual household borrowers. Delivery of the student loan plan is completed within one month of receiving all requested information.

Other Types of Fees and Expenses

Our fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which may be incurred by the client. Clients may incur certain charges imposed by custodians and other third parties such as custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual fund and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to our fee, and we shall not receive any portion of these commissions, fees, and costs.

Item 12 further describes the factors that we consider in selecting or recommending custodians for our clients transactions and determining the reasonableness of their compensation (e.g., commissions).

We do not accept compensation for the sale of securities or other investment products including asset-based sales charges or service fees from the sale of mutual funds or ETFs.

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

We do not charge any performance-based fees.

Item 7: Types of Clients

WFP provides combined investment management and comprehensive financial planning services to individuals, high net-worth individuals, corporations, and other businesses.

We do not have a minimum account size requirement.

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

Passive Investment Management

We primarily practice passive investment management. Passive investing involves building portfolios that are comprised of various distinct asset classes. The asset classes are weighted in a manner to achieve a desired relationship between correlation, risk, and return. Funds that passively capture the returns of the desired asset classes are placed in the portfolio. The funds that are used to build passive portfolios are typically index mutual funds or exchange traded funds.

Passive investment management is characterized by low portfolio expenses (i.e., the funds inside the portfolio have low internal costs), minimal trading costs (due to infrequent trading activity), and relative tax efficiency (because the funds inside the portfolio are tax efficient and turnover inside the portfolio is minimal).

In contrast, active management involves a single manager or managers who employ some method, strategy, or technique to construct a portfolio that is intended to generate returns that are greater than the broader market or a designated benchmark.

Material Risks Involved

All investing strategies we offer involve risk and may result in a loss of your original investment which you should be prepared to bear. Many of these risks apply equally to stocks, bonds, commodities and any other investment or security. Material risks associated with our investment strategies are listed below.

Market Risk: Market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the value of the investment regardless of the operational success of the issuer's operations or its financial condition.

Strategy Risk: The Adviser's investment strategies and/or investment techniques may not work as intended.

Small and Medium Cap Company Risk: Securities of companies with small and medium market capitalizations are often more volatile and less liquid than investments in larger companies. Small and medium cap companies may face a greater risk of business failure, which could increase the volatility of the client's portfolio.

Turnover Risk: At times, the strategy may have a portfolio turnover rate that is higher than other strategies. A high portfolio turnover would result in correspondingly greater brokerage commission

expenses and may result in the distribution of additional capital gains for tax purposes. These factors may negatively affect the account's performance.

Limited markets: Certain securities may be less liquid (harder to sell or buy) and their prices may at times be more volatile than at other times. Under certain market conditions we may be unable to sell or liquidate investments at prices we consider reasonable or favorable or find buyers at any price.

Concentration Risk: Certain investment strategies focus on asset-classes, industries, sectors or types of investment. From time to time these strategies may be subject to greater risks of adverse developments in such areas of focus than a strategy that is more broadly diversified across a wider variety of investments.

Interest Rate Risk: Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true: bond prices generally rise when interest rates fall. In general, fixed income securities with longer maturities are more sensitive to these price changes. Most other investments are also sensitive to the level and direction of interest rates.

Legal or Legislative Risk: Legislative changes or Court rulings may impact the value of investments, or the securities' claim on the issuer's assets and finances.

Inflation: Inflation may erode the buying-power of your investment portfolio, even if the dollar value of your investments remains the same.

Risks Associated with Securities

Apart from the general risks outlined above which apply to all types of investments, specific securities may have other risks.

Exchange-Traded Funds ("ETF") Risk - Most ETFs are passively managed investment companies whose shares are purchased and sold on a securities exchange. An ETF represents a portfolio of securities designed to track a particular market segment or index. ETFs are subject to the following risks that do not apply to conventional funds:

- The market price of the ETF's shares may trade at a premium or a discount to their net asset value;
- An active trading market for an ETF's shares may not develop or be maintained; and
- There is no assurance that the requirements of the exchange necessary to maintain the listing of an ETF will continue to be met or remain unchanged

Mutual Funds Risk - The following is a list of some general risks associated with investing in mutual funds.

- *Country Risk* - The possibility that political events (a war, national elections), financial problems (rising inflation, government default), or natural disasters (an earthquake, a poor

- harvest) will weaken a country's economy and cause investments in that country to decline.
- *Currency Risk* -The possibility that returns could be reduced for Americans investing in foreign securities because of a rise in the value of the U.S. dollar against foreign currencies. Also called exchange-rate risk.
- *Income Risk* - The possibility that a fixed-income fund's dividends will decline as a result of falling overall interest rates.
- *Industry Risk* - The possibility that a group of stocks in a single industry will decline in price due to developments in that industry.
- *Inflation Risk* - The possibility that increases in the cost of living will reduce or eliminate a fund's real inflation-adjusted returns.
- *Manager Risk* -The possibility that an actively managed mutual fund's investment adviser will fail to execute the fund's investment strategy effectively resulting in the failure of stated objectives.
- *Market Risk* -The possibility that stock fund or bond fund prices overall will decline over short or even extended periods. Stock and bond markets tend to move in cycles, with periods when prices rise and other periods when prices fall.
- *Principal Risk* -The possibility that an investment will go down in value, or "lose money," from the original or invested amount.

Item 9: Disciplinary Information

On March 22nd, 2021, Wrenne Financial Planning unknowingly violated the Pennsylvania Securities Act of 1972, 70 P.S. § 1-101 et. seq. ("1972 Act") by exceeding five (5) clients without being notice filed in the state. This was discovered by the Pennsylvania Department of Banking and Securities during their review of WFP's application to register in March 2021 and occurred under the advice of WFP's compliance consultant at the time. In July 2021, without admitting or denying the allegations, WFP agreed to a Consent Agreement and Order ("Order") proposed by the Pennsylvania Securities Division agreeing to pay an administrative assessment of \$4,000 and cease any future violations of the act. WFP's former compliance consultant agreed to compensate WFP for the fines and has since been replaced with a new compliance consulting firm.

Item 10: Other Financial Industry Activities and Affiliations

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

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

WFP only receives compensation directly from clients. We do not receive compensation from any outside source.

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

General Information

We have adopted a Code of Ethics for all employees of the firm describing its high standards of business conduct, and fiduciary duty to you, our client. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts, the reporting of certain gifts and business entertainment items, and personal securities trading procedures. All of our employees must acknowledge the terms of the Code of Ethics upon hire and as amended.

Participation or Interest in Client Accounts

Our compliance policies and procedures prohibit anyone associated with WFP from having an interest in a client account or participating in the profits of a client's account without the approval of the Chief Compliance Officer ("CCO").

The following acts are prohibited:

- Employing any device, scheme or artifice to defraud;
- Making any untrue statement of a material fact;
- Omitting to state a material fact necessary in order to make a statement, in light of the circumstances under which it is made, not misleading;
- Engaging in any fraudulent or deceitful act, practice or course of business; and
- Engaging in any manipulative practices.

Clients and prospective clients may request a copy of the firm's Code of Ethics by contacting the CCO.

Personal Trading

WFP can recommend securities to clients that we will purchase for our own personal accounts. We can trade securities in our account that we have recommended to clients as long as we place our orders after client orders or block trades. This policy is meant to prevent WFP from benefiting as a result of transactions placed on behalf of advisory accounts.

WFP has a personal securities transaction policy in place to monitor the personal securities transactions and securities holdings of all employees. The policy requires that an employee of the firm provide the CCO or their designee with their current securities holdings within ten (10) days after becoming an employee. Additionally, each employee must provide the CCO or their designee with the employee's current securities holdings at least once each twelve (12) month period thereafter.

WFP has established the following restrictions in order to ensure our fiduciary responsibilities regarding

insider trading are met:

- No securities for our personal portfolios shall be bought or sold where this decision is substantially derived, in whole or in part, from the role of IARs of WFP, unless the accounts are traded together with client accounts in an aggregate transaction (so the pricing is the same as clients' pricing) or the information is available to the investing public on reasonable inquiry. In no case, shall we put our own interests ahead of yours.

Privacy Statement

We are committed to safeguarding your confidential information and hold all personal information provided to us in the strictest confidence. These records include all personal information that we collect from you or receive from other firms in connection with any of the financial services they provide. We also require other firms with whom we deal with to restrict the use of your information. Our Privacy Policy is available upon request.

Conflicts of Interest

We act in a fiduciary capacity. If a conflict of interest arises between WFP and any client, we shall make every effort to resolve the conflict in the client's favor. Conflicts of interest may also arise in the allocation of investment opportunities among the accounts that we advise. We will seek to allocate investment opportunities according to what we believe is appropriate for each account. WFP strives to do what is equitable and in the best interests of all the accounts we advise.

Item 12: Brokerage Practices

We do not maintain custody of your assets that we manage, although we may be deemed to have custody of your assets if you give us authority to withdraw assets from your account (see Item 15—Custody, below). Your assets must be maintained in an account at a “qualified custodian,” generally a broker-dealer or bank. We recommend that our clients use Charles Schwab & Co., Inc. (“Schwab”), a registered broker-dealer, member SIPC, as the qualified custodian.

We are independently owned and operated and are not affiliated with Schwab. Schwab will hold your assets in a brokerage account and buy and sell securities when we instruct them to do so. While we recommend that you use Schwab as custodian/broker, you will decide whether to do so and will open your account with Schwab by entering into an account agreement directly with them.

We do not open the account for you, although we may assist you in doing so. Even though your account is maintained at Schwab, we can still use other brokers to execute trades for your account as described below (see “Your brokerage and custody costs”).

How we select brokers/custodians

We seek to recommend a custodian/broker that will hold your assets and execute transactions. When

considering whether the terms that Schwab provides are, overall, most advantageous to you when compared with other available providers and their services, we consider a wide range of factors, including:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody)
- Capability to execute, clear, and settle trades (buy and sell securities for your account)
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds "ETFs", etc.)
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices
- Reputation, financial strength, security, and stability
- Availability of other products and services that benefit us, as discussed below (see "Products and services available to us from Schwab")

Your brokerage and trading costs

For our clients' accounts that Schwab maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. Certain trades (for example, many mutual funds, and U.S. exchange-listed equities and ETFs) may not incur Schwab commissions or transaction fees. Schwab is also compensated by earning interest on the uninvested cash in your account in Schwab's Cash Features Program.

We are not required to select the broker or dealer that charges the lowest transaction cost, even if that broker provides execution quality comparable to other brokers or dealers. Although we are not required to execute all trades through Schwab, we have determined that having Schwab execute most trades is consistent with our duty to seek "best execution" of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see "How we select brokers/ custodians"). By using another broker or dealer you may pay lower transaction costs.

Products and services available to us from Schwab

Schwab Advisor Services™ is Schwab's business serving independent investment advisory firms like ours. They provide us and our clients with access to their institutional brokerage services (trading, custody, reporting, and related services), many of which are not typically available to Schwab retail customers. However, certain retail investors may be able to get institutional brokerage services from Schwab

without going through our firm. Schwab also makes available various support services. Some of those services help us manage or administer our clients' accounts, while others help us manage and grow our business. Schwab's support services are generally available at no charge to us. Following is a more detailed description of Schwab's support services:

Services that benefit you. Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab's services described in this paragraph generally benefit you and your account.

Services that do not directly benefit you. Schwab also makes available to us other products and services that benefit us but do 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 Schwab's 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 Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- Provide access to client account data (such as duplicate trade confirmations and account statements)
- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- Provide pricing and other market data
- Facilitate payment of our fees from our clients' accounts
- Assist with back-office functions, record keeping, and client reporting

Services that generally benefit only us. Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events
- Consulting on technology and business needs
- Publications and conferences on practice management and business succession
- Access to employee benefits providers, human capital consultants, and insurance providers
- Marketing consulting and support

Schwab provides some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab also discounts or waives its fees for some of these services or pays all or a part of a third party's fees. Schwab also provides us with other benefits, such as occasional business entertainment of our personnel. If you did not maintain your account with Schwab, we would be required to pay for these services from our own resources.

Our interest in Schwab's services

The availability of these services from Schwab benefits us because we do not have to produce or

purchase them. We don't have to pay for Schwab's services. These services are not contingent upon us committing any specific amount of business to Schwab in trading commissions or assets in custody. The fact that we receive these benefits from Schwab is an incentive for us to recommend the use of Schwab rather than making such decision based exclusively on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a conflict of interest.

Best Execution

We have an obligation to seek best execution for you. In seeking best execution, the determinative factor is not the lowest possible commission cost but whether the transaction represents the best qualitative execution, taking into consideration the full range of a custodian services, including the value of research provided, execution capability, commission rates, reputation and responsiveness. Therefore, we will seek competitive commission rates, but we do not promise to obtain the lowest possible commission rates for account transactions.

Brokerage for Client Referrals

We do not receive client referrals from the qualified custodian we use.

Directed Brokerage

We do not permit directed brokerage. We will require you to use the custodian of our choosing as the custodial firm.

Aggregating (Block) Trading for Multiple Client Accounts

Generally, we combine multiple orders for shares of the same securities purchased for advisory accounts we manage (this practice is commonly referred to as "block trading"). We will then distribute a portion of the shares to participating accounts in a fair and equitable manner. The distribution of the shares purchased is typically proportionate to the size of the account, but it is not based on account performance or the amount or structure of management fees. Subject to our discretion, regarding circumstances and market conditions, when we combine orders, each participating account pays an average price per share for all transactions and pays a proportionate share of all transaction costs. Accounts owned by our firm or persons associated with our firm may participate in block trading with your accounts; however, they will not be given preferential treatment.

Item 13: Review of Accounts

Each clients respective Investment Advisor Representative ("IAR") will work with their respective clients to obtain current information regarding their assets and investment holdings and will review this information as part of our services.

Client accounts will be reviewed regularly on a quarterly basis by their respective IAR. During the regular

review the account's performance is compared against like-managed accounts to identify any unacceptable performance deviation. Additionally, reasonable client-imposed restrictions will be reviewed to confirm that they are being enforced. Events that may trigger a special review would be unusual performance, addition, or deletions of client-imposed restrictions, excessive draw-down, volatility in performance, or buy and sell decisions from the firm or per client's needs. Additionally, WFP meets with clients on a quarterly basis to review investments. More or less frequent meetings will be dictated by client needs.

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

WFP does not provide written reports to clients outside of the initial comprehensive financial plan. Updated plans will be provided when material changes are made to the financial plan.

Item 14: Client Referrals and Other Compensation

Charles Schwab & Co., Inc - Institutional

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. We benefit from the products and services provided because the cost of these services would otherwise be borne directly by us, and this creates a conflict. You should consider these conflicts of interest when selecting a custodian. These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12—Brokerage Practices).

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.

Finance for Physicians

Daniel Wrenne owns and operates the Finance for Physicians website and podcast. The entity is affiliated with WFP through common control and ownership. While Finance for Physicians references WFP on their website, revenues are not shared between Finance for Physicians and WFP. The content of podcasts are intended for informational purposes only and are not intended to be investment advice.

Item 15: Custody

WFP is deemed to have limited custody solely because certain advisory fees are directly deducted from the client's investment account(s) by the custodian on behalf of WFP. Clients should receive at least quarterly statements from the broker-dealer, bank or other qualified custodian that holds and maintains a client's investment assets. We urge you to carefully review such statements and compare such official custodial records to the account statements or reports that we may provide to you. Our statements or reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16: Investment Discretion

We maintain discretion over client accounts with respect to securities to be bought and sold and the amount of securities to be bought and sold. Investment discretion is explained to clients in detail when an advisory relationship has commenced. At the start of the advisory relationship, the client will execute a Limited Power of Attorney, which will grant our firm discretion over the account. Additionally, the discretionary relationship will be outlined in the *client agreement* and signed by WFP and the client.

Item 17: Voting Client Securities

We do not vote client proxies. Therefore, clients maintain exclusive responsibility for: (1) voting proxies, and (2) acting on corporate actions pertaining to the client's investment assets. The client shall instruct their respective qualified custodian to forward copies of all proxies and shareholder communications relating to the client's investment assets. If the client would like WFP's opinion on a particular proxy vote, they may contact us at the number listed on the cover of this brochure.

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

Item 18: Financial Information

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about our financial condition. We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to clients, and we have not been the subject of a bankruptcy proceeding.

We do not have custody of client funds or securities or require or solicit prepayment of more than \$1,200 in fees per client six (6) months in advance. All upfront and ongoing portions of WFP's fees that are

payable in advance, correspond with work that is completed within six (6) months after the firm collects the fee. As such, WFP does not accept prepayment of client fees in the amount of \$1,200 six (6) months or more in advance of services rendered.