



**TOTAL
WEALTH
PLANNING**

Disclosure Brochure

(Part 2A of Form ADV)

TOTAL WEALTH PLANNING, LLC

4665 Cornell Rd, Suite 160

Cincinnati, OH 45241

513-984-6696

513-984-9270 (Fax)

ROB@TWPTEAM.COM

This Disclosure Brochure provides information about the qualifications and business practices of Total Wealth Planning, LLC (the "Firm"). If you have any questions about the contents of this Disclosure Brochure, please contact us at: 513-984-6696, or by email at: info@twpteam.com.

The information in this Disclosure Brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC"), or by any state securities authority. Being registered with the SEC alone does not imply any level of skill or training. Please see industry specific certifications listed in the Brochure Supplement (Part 2B).

Additional information about the Firm is available on the SEC's website at www.adviserinfo.sec.gov

July 31, 2015

Material Changes

Annual Update

The Material Changes section of this Disclosure Brochure will be updated annually when material changes occur since the previous release of the Disclosure Brochure.

Material Changes since the Last Update

- The Firm changed names from “DRR Partners LLC d/b/a Financial Management Group” to “Total Wealth Planning, LLC”
- Joel Musser, CFP joined the firm as a wealth advisor, replacing Matt Will, CFP as financial planner.
- The Firm ownership changed when advisors, Rob Siegmann, Dave Wilder and Rob Lemmons purchased 100% from the founder, Brett Wilder.
- Total Wealth Planning accepts custody of client funds and securities in order to provide investment management services to client accounts held with employer sponsored retirement plans (i.e. 401k, 403b). Please see the topic Custody on page 15 for more details about the firm’s custody status.

Full Brochure Available

Whenever you would like to receive a complete copy of our Disclosure Brochure, please contact us by telephone at: 513-984-6696 or by email at: rob@twpteam.com.

Table of Contents

Material Changes	i
Advisory Business.....	1
Fees and Compensation	5
Performance-Based Fees	7
Types of Clients	7
Methods of Analysis, Investment Strategies and Risk of Loss	8
Disciplinary Information	10
Other Financial Industry Activities and Affiliations.....	10
Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....	10
Brokerage Practices	12
Review of Accounts.....	14
Client Referrals	15
Custody.....	16
Investment Discretion	17
Voting Client Securities.....	18
Financial Information.....	18
Business Continuity Plan.....	18
Information Security Program	19
Brochure Supplement (Part 2B of Form ADV)	21

Advisory Business

Total Wealth Planning, LLC (“Total Wealth Planning” or the “Firm”), formerly known as DRR Partners, LLC d/b/a Financial Management Group, is an independent, Securities & Exchange Commission (“SEC”) registered investment advisor formed in January 2015.

Total Wealth Planning acquired the investment management process and client relationships of Financial Management Group, Inc., an SEC registered investment advisor (CRD# 106068). The Firm will assume the advisory role over the former clients of Financial Management Group, Inc. by helping clients address their financial concerns, and provide them with answers about how to reach their lifetime goals. Our approach combines comprehensive financial planning with investment advisory services in order to fulfill all your financial management needs.

Since the Firm is focused on investment management, this means the firm does not sell annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products. No commissions or finder’s fees in any form are accepted.

Investment advice is an integral part of financial planning and is tailored to the specific needs of all clients. The Firm does not act as a custodian of client assets. The client always maintains asset distribution control. The Firm places trades for clients under a limited power of attorney.

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly by the client as recommended by the Firm or as-needed by the client. Conflicts of interest will be disclosed to the client in the unlikely event they should occur.

The initial meeting, which may be by telephone, is free of charge and is considered an exploratory interview to determine the extent to which financial management services may be beneficial to the client.

Principal Owners

Total Wealth Planning, LLC is owned by Robert Siegman, Robert Lemmons, and David Wilder.

Types of Advisory Services

Total Wealth Planning provides comprehensive financial planning services to clients on matters not involving securities, such as cash flow and net worth analysis, tax planning and projections, retirement goal setting and roadmap development, independent and objective insurance needs analysis and policy reviews, comprehensive college planning and selection services, and multigenerational estate planning strategies.

Total Wealth Planning also provides investment supervisory services, also known as asset management services utilizing a time tested, Nobel-Prize winning investment philosophy.

As of July 23, 2015, the Firm manages the following assets for its clients:

Discretionary Assets:	Non-Discretionary Assets:	Total Assets:
\$60,642,608	\$312,931,370	\$373,573,978

Tailored Relationships

The goals and objectives for each client are documented in each client's individual Financial Management Review document, that is updated annually for wealth management clients. Portfolio asset allocation policy statements are created that reflect the stated goals and objectives, and consider the individual client risk tolerance and age. Clients may impose restrictions on divesting or investing in certain securities or types of securities.

Agreements may not be assigned without client consent.

Types of Agreements

Total Wealth Planning offers clients and prospective clients three distinct levels of services as described below:

Millionaire In-The-Making is an investment management focused service offering for clients who have embraced a focus on accumulating wealth for achieving a lifetime of security & independence.

Millionaire Program is a comprehensive service offering for clients who have achieved Millionaire status and desire a professionally managed investment experience alongside a proactive and comprehensive financial planning relationship.

Millionaire CFO is a service offering for Millionaire clients, primarily business owners and corporate executives, who have accumulated substantial wealth, and

require a coordinated, experienced team of wealth management professionals functioning as their full-time CFO, in order to ensure continued asset growth and prudent preservation.

Millionaire In-The-Making Overview

Total Wealth Planning provides three levels of client engagements necessary to meet the individual client needs. Each of the engagements will provide a professionally managed investment experience utilizing a low cost, institutional investment toolkit designed to deliver a competitive risk adjusted return.

The Millionaire-in-the-Making service offering (In-The-Making) is focused on preserving and building the client's investment portfolio value while also providing the essential financial planning components such as setting goals for college and retirement. Once these goals are set, the Firm will offer periodic updates on where the client stands relative to meeting these goals and also suggesting what actions are necessary to stay on track. Services included as part of the In-The-Making offering are:

- Safe custody of investment assets with monthly account statements.
- Investment risk tolerance assessment, portfolio asset allocation design, implementation and monitoring.
- Quarterly consolidated investment reporting, including current and historical performance results.
- Net Worth financial statements prepared and reviewed annually (if data is provided).
- Providing clients with recommendation for what types of accounts should be used for meeting college and retirement goals such as IRA's, 401k, Roth IRAs, State 529 plans, or non-qualified accounts.
- Assisting the client with the selection of other financial professionals to assist with insurance needs, estate planning, tax planning and preparation, and mortgage and lending needs.
- Consolidating and simplifying the client's investment portfolio and tax reporting process.

Assets are invested primarily in low cost, institutional and no-load mutual funds and exchange-traded funds. Fund companies charge each fund shareholder an investment management fee that is disclosed in the fund prospectus. Discount brokerages such as Charles Schwab may charge a transaction fee for the purchase of some institutional class mutual funds. THE FIRM does not receive any compensation, in any form, from fund companies.

Investments may also include: equities (stocks), corporate debt securities, certificates of deposit, municipal securities, investment company securities (variable life insurance, variable annuities, and mutual funds shares), U. S.

government securities, options contracts, and interests in partnerships. Initial public offerings (IPOs) are not available through THE FIRM.

The Firm may work with clients on an hourly basis on specific one-time issues outside the scope of the In-The-Making service offering. The fee is a maximum \$250/hour plus out of pocket expenses. The Firm will provide the client with an estimated project fee before work is initiated. The project fee may be prepaid, at the election of the client, or paid as services are provided. The Firm agrees to refund the total amount of all fees paid if the client is not satisfied with the services performed.

Clients and prospects may request a complete list of services offered under the In-The-Making agreement.

Millionaire Program Overview

The Millionaire Program (Program) offers all services included in the In-The-Making service offering, and further combines Total Wealth Planning's proactive investment management and integrated financial planning services. Most clients choose to have THE FIRM manage all aspects of their financial affairs. Realistic and measurable goals are set and objectives to reach those goals are defined. As goals and objectives change over time, suggestions are made and implemented on an ongoing basis.

The scope of work for the Program includes: investment management (including performance reporting); retirement planning; tax planning; education planning; estate planning; cash flow management; insurance review; as well as the implementation or guidance of recommendations within each area.

The Program also extends the depth and complexity of portfolio design and investment tools utilized to accommodate the larger portfolio's need for risk reduction and additional tax efficiency.

Clients and prospects may request a complete list of services offered under the Program agreement.

Millionaire CFO Overview

The Millionaire CFO (CFO) offers all services included in the In-The-Making and Program service offerings, and further extends the level of support, guidance and access to specialized Total Wealth Planning experts in the areas of business planning, executive compensation, college planning and negotiations, and multi-generational estate planning. Clients will also have full access to the Total Wealth Planning team to deliver concierge type services for financial organization, financial technology assistance, and meetings to the client's preferred location. CFO clients

are also offered “Family Office” type services via a third party for bill paying, tax preparation and document scanning and warehousing.

Clients and prospects may request a complete list of services offered under the CFO agreement.

Termination of Agreement

Each service offering is an ongoing agreement with proactive and constant adjustments. The length of service to the client is at the client’s discretion. The client or the Firm may terminate an Agreement by written notice to the other party at any point and for any reason without penalty. At termination, fees will be billed on a pro rata basis for the portion of the quarter completed. The portfolio value at the time of termination will be used as the basis for the fee computation, adjusted for the number of days during the billing quarter prior to termination.

Fees and Compensation

Description

TOTAL WEALTH PLANNING bases fees on a percentage of assets under management, subject to a minimum fee for each of the three service offerings.

The fee schedule is as follows:

- First \$750,000 of Investment Assets assessed at 1.25% per annum
- Next \$1,250,000 of Investment Assets assessed at 0.90% per annum
- Next \$3,000,000 of Investment Assets assessed at 0.70% per annum
- Next \$3,000,000 of Investment Assets assessed at 0.50% per annum
- Over \$8,000,000 of Investment Assets assessed at 0.35% per annum

Fees are subject to a Minimum Quarterly Fee by Service Offering:

- Millionaire In-The-Making = \$750 per quarter
- Millionaire Program = \$2,250 per quarter
- Millionaire CFO = \$5,000 per quarter

Fees are negotiable in circumstances when multiple client relationships result from the same immediate family.

Existing clients may be grandfathered under previous fee agreements not listed in this brochure.

Fee Billing

Wealth Management Advisory Fees are billed quarterly based on a set month of each calendar quarter. This means that one-third of clients are billed the first month of each quarter (Jan-Apr-Jul-Oct) and are invoiced as the quarter begins. Another one-third of clients are billed in the second month of each calendar quarter (Feb-May-Aug-Nov) and are invoiced in the middle of each quarter. The final one-third of clients are billed the third month of each calendar quarter (Mar-Jun-Sep-Dec) and are invoiced toward the end of each quarter. The last day of the prior month's portfolio value is used for fee calculation purposes. Clients may choose to request a change in what month they are invoiced for any reason by writing or calling the Firm. Payment in full is expected within 30 days of invoice presentation. Fees are deducted proportionally across client investment accounts with few exceptions. The client must consent in advance to direct debiting of their investment account.

Fees for financial plans are billed 50% in advance, with the balance due after 6 months and upon the client's satisfaction of the financial planning process.

Other Fees

Custodians such as Charles Schwab may charge transaction fees on purchases or sales of certain mutual funds and exchange-traded funds. These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

THE FIRM, in its sole discretion, may waive its minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.).

Expense Ratios

Mutual funds generally charge a management fee for their services as investment managers. This management fee is called an expense ratio and is disclosed in the fund's prospectus or by reviewing the fund's profile on any popular finance website. For example, an expense ratio of 0.50 means that the mutual fund company charges 0.5% for their services. Performance figures quoted by mutual fund companies in various publications are after their fees have been deducted. These fees are in addition to the fees paid by you to the Firm. The Firm places high emphasis on using low internal cost investments for client portfolios.

Past Due Accounts and Termination of Agreement

The Firm reserves the right to stop work on any account that is more than 90 days overdue. In addition, the Firm reserves the right to terminate any financial planning engagement where a client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate, in THE FIRM'S judgment, to providing proper financial advice. Any unused portion of fees collected in advance will be refunded within 30 days.

Performance-Based Fees

Sharing of Capital Gains

All financial planning and investment management fees are NOT based on a share of the capital gains or capital appreciation of managed securities.

Total Wealth Planning does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for an adviser to recommend an investment that may carry a higher degree of risk to the client.

Types of Clients

Description

Total Wealth Planning provides comprehensive wealth management including investment advice to individual families. A typical client of the Firm is one that chooses to hire an experienced and trusted advisor to guide their family through changing complexities in investment, tax and many other financial areas of life. Based on the value and depth of advice, the Firm naturally attracts good wealth accumulators who live rewarding lives unpretentiously within their means, and tend to give back some of their financial success in order to help others have more meaningful lives.

Client relationships vary in scope and length of service.

Account Minimums

In order to serve our clients in the most effective manner, the Firm requires a minimum quarterly fee for each level of service offering. All service offerings are

available to clients who do not meet the suggested investable assets, but who are willing to pay the minimum quarterly fee.

The Millionaire In-The-Making service offering requires a minimum quarterly fee of \$750 and is suggested as an appropriate offering for prospective clients with greater than \$250,000 in investable assets, including employer based retirement plans.

The Millionaire Program service offering requires a minimum quarterly fee of \$2,250 and is suggested as an appropriate offering for prospective clients with greater than \$750,000 in investable assets, including employer based retirement plans.

The Millionaire CFO service offering requires a minimum quarterly fee of \$5,000 and is suggested as an appropriate offering for prospective clients with greater than \$2,000,000 in investable assets, including employer based retirement plans.

Depending upon circumstances, the Firm will make suggestions to shift to a more appropriate service offering to ensure adequate value is being added for the fee charged.

The Firm has the discretion to waive the account minimum or fee when the client and the advisor anticipate adding additional funds to the accounts within a reasonable time to meet stated minimums. Other exceptions may apply for direct family members of existing clients.

Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

Security analysis methods include fundamental, technical, and cyclical analysis. Most investment analysis emphasis is on macroeconomic factors on a worldwide basis.

The main sources of information include economic data provided by the Federal Reserve System, Bureau of Labor Statistics, and other government databases.

Other sources of information that the Firm may use include J.P. Morgan quarterly guide to the markets, Bloomberg, Morningstar mutual fund information, Fritz Meyer Financial economist, Charles Schwab & Company's Equity Ratings service, and other credible and objective resources from publications and the World Wide Web.

Investment Strategies

The primary investment strategy used on client accounts is strategic and tactical asset allocation utilizing a core and satellite approach. This means that we use primarily passively-managed index and exchange-traded funds as the core

investments, and then complement with actively-managed funds where there are greater opportunities to provide risk reduction through additional diversification and active security selection. Portfolios are globally diversified to control the risk associated with traditional markets.

The investment strategy for a specific client is based upon the objectives stated by the client during ongoing discussions and responses on frequent risk tolerance assessments. The client may revise and update these objectives at any time. Each client approves a strategic portfolio asset allocation plan that the Firm uses as an investment policy statement.

Risk of Loss

All investment programs have certain risks that are borne by the investor, including risk of loss. The Firm's investment approach constantly looks to keep the risk of loss in mind and mitigate through means of dynamic diversification. All investors face the following investment risks:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like. Diversification is the cornerstone of the Firm's investment philosophy with the goal to minimize the diversifiable business risk.

- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid as the marketplace of buyers and sellers is larger, and this is typical in more standardized assets. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Disciplinary Information

Legal and Disciplinary

The Firm and its employees have not been involved in legal or disciplinary events related to past or present investment clients. Total Wealth Planning takes great care to conduct extensive legal, disciplinary and personal background checks on all current and future employees.

Other Financial Industry Activities and Affiliations

Financial Industry Activities

Total Wealth Planning is registered with the SEC as an independent investment advisor, and has no affiliation with any securities broker dealers.

Affiliations

Total Wealth Planning is affiliated and a registered corporate member of the National Association of Personal Financial Advisors (NAPFA). NAPFA members adhere to the highest level of fiduciary standards and the fee-only model seeks to minimize any conflicts of interest and objectivity.

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

Code of Ethics

The employees of the Firm have committed to a Code of Ethics that is available for review by clients and prospective clients. The Firm and its personnel owe a duty of loyalty, fairness and good faith towards clients, and the obligation to adhere not only to the specific provisions of the Code but to the general principles that guide the Code.

The Code covers a range of topics including: general ethical principles, reporting personal securities trading (insider trading), reporting ethical violations, handling errors and omissions, distribution of the Code, review and enforcement processes. The Firm will provide a copy of the Code to any client or prospective client upon request.

Insider Trading

Part of the Firm's code of ethics policy addresses the concerns of using non-public information discussed with clients for profit. It is the policy of the Firm that employees are NOT to trade stocks of companies where the firm has a client relationship with a high level manager or executive of any publicly traded stock who may potentially provide us with inside information. A watch list of applicable stocks is maintained and updated quarterly as new clients meeting this criteria engage the firm. A review of all employee transactions are compared with this list on a quarterly basis for all Schwab and non-Schwab investment accounts.

Personal Trading

The Chief Compliance Officer of the Firm is Robert Siegmann, who is responsible for reviewing all employee personal trades. His personal trades are monitored and reviewed by someone other than himself. The personal trading reviews ensure that employees adhere to the Firm trading policies and that clients of the firm are not negatively affected in any way. Since most employee trades are mutual fund trades or exchange-traded fund trades, the Firm has low risk in this area.

Participation or Interest in Client Transactions

Total Wealth Planning and its employees are permitted to buy or sell mutual funds or other securities that are recommended to clients. Firm employees typically invest their own money in the same strategy and mutual funds that are recommended to clients. Employees are not permitted to purchase any non-mutual fund securities for their own accounts ahead of client trades to avoid any

conflicts that may arise. Employees comply with the provisions of the Firm's *Compliance Manual*.

Brokerage Practices

Selecting Brokerage Firms

The Firm does not maintain custody of your assets (although we are deemed to have custody on some held-away assets (i.e. 401k's), see Item 15 Custody, below). Instead, the Firm recommends clients establish brokerage accounts with Schwab Institutional, a division of Charles Schwab & Co., Inc. ("Schwab"), a FINRA-registered broker-dealer, member SIPC, and qualified custodian to maintain custody of clients' assets and to effect trades for their accounts. The Firm is independently owned and operated and not affiliated with Schwab, and does not receive fees or commissions from Schwab or any other source. Although the Firm may recommend that clients establish accounts at Schwab, it is the client's decision to custody assets with Schwab. If you do not wish to place your non-employer based investments or eligible assets with Schwab, then we cannot manage those specific investment accounts.

We seek to select a custodian who will hold your assets and execute transactions on terms that are overall most advantageous when compared to other available providers and their services. We consider a wide range of factors, including, among others, the following:

- reputation, financial strength, fraud prevention and stability of the provider
- capability to execute, clear and settle trades (buy and sell securities for your account)
- breadth of investment products made available (stocks, bonds, mutual funds, exchange traded funds (ETFs), etc.)
- quality and price of services (trading commissions, account fees, etc.) and willingness to negotiate those on behalf of our clients.
- capabilities to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- availability of other products and services that benefit us, as discussed below (see "*Products and Services Available to Us from Schwab*")

The Firm is not committed to Schwab for any specific amount of business (assets in custody or trading commissions). Schwab's brokerage services include the execution of securities transactions, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

Schwab client services provide telephone, internet and mobile access to all client accounts, and also provides ongoing servicing issues for some clients.

Brokerage Costs

For our clients' accounts, Schwab does not charge separately for custody services but is compensated by charging you commissions on mutual fund and ETF trades that it executes for your Schwab account. Schwab's trading commissions applicable to our client accounts were negotiated based on the large amount of client accounts and assets maintained. This commitment benefits you because the overall trading commissions you pay are lower than they would be if we did not have this level of assets held with Schwab.

Best Execution

The Firm reviews the execution of trades, trading fees charged by Schwab and their competitors, and any other custodian related costs on an annual basis and is documented in the the Firm *Compliance Manual*. The Firm does not receive any portion of the trading fees.

Products & Services Available to Us from Schwab

Schwab Advisor Services (formerly called Schwab Institutional) is Schwab's subsidiary serving independent investment advisory firms like the Firm. They provide us and our clients with access to institutional brokerage services, trading, custody, reporting and related services. Schwab also offers services to help us administer our clients' accounts as well as, help us manage and grow our business. Schwab's support services are generally available on an unsolicited basis (we don't have to request them) and at no charge to us as long as we keep a total of at least \$10 million of our clients' assets in accounts at Schwab. Additionally, Schwab offers the Firm a third party technology budget geared to improve client services with an expectation our clients maintain a minimum of \$350 million of client assets at Schwab.

Services that Benefit You.

Schwab's institutional brokerage offerings 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 many lower cost vehicles we might not otherwise have access or that would require a significantly higher minimum initial investment by individual clients.

Services that May Not Directly Benefit You.

Schwab also offers services that benefit us but may not directly benefit you or your account. These services assist us in managing and administering our clients' accounts, including investment research and other technology that:

- provide access to client account data and duplicate statements;
- educational conferences and events
- assist with back-office functions, recordkeeping and client reporting.
- technology, compliance, legal, and business consulting;
- facilitate payment of our fees from our clients' accounts; and
- other benefits such as occasional business entertainment of our personnel.

Our Interest in Schwab's Services

The availability of these services from Schwab provides benefits to both the Firm and our clients. The Firm is able to direct our time and energy on serving you, the client, instead of producing these services ourselves. Schwab's services are offered at no cost as long as we keep more than \$10 million of client assets at Schwab. Schwab also offers an additional technology budget if we maintain a minimum of \$350 million of client's assets with Schwab. These expected minimums may give us an incentive to recommend you maintain your account with Schwab based on our interest in receiving Schwab's services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest. We believe, however, that our selection of Schwab as custodian is in the best interests of our clients given the criteria above (see *"How We Select Custodians"*).

Order Aggregation

Most trades are mutual funds or exchange-traded funds where trade aggregation does not garner any client benefit.

Review of Accounts

Review of Comprehensive Financial Plans

Client financial plans are comprehensive and personalized by design. Clients engaged using the comprehensive wealth management services will be offered written updates to their financial plan at least annually in person. Many clients with urgent or other complex financial planning matters are offered more frequent updates in person, by telephone and by email. Reviews involve updating all aspects of client's personal net worth and cash flow, employment and benefits, tax reduction strategies, comprehensive college selection and funding planning, insurance coverage and multigenerational estate planning. Financial plans are reviewed by all client advisors as listed in part 2B of this document.

Review of Client Investment Accounts

Investment account reviews are performed quarterly by the Firm's investment advisor staff. Investment advisors perform reviews of all investment advisory accounts no less than quarterly. Accounts are reviewed for consistency with the firm's current investment strategy, the global economic conditions, and client stated goals and objectives. Account reviews are performed more frequently when market conditions dictate.

Review Triggers

Investment accounts are reviewed no less than quarterly on a planned review schedule. Reviews may also be triggered by changes in an account holder's personal, tax, or financial status. Other conditions that may trigger a review are changes in the tax laws, new investment information, and changes in macroeconomic factors and country specific events.

Regular Investment Reports

Investment account reviewers are members of the firm's Investment Committee. They are instructed to consider the client's current security positions and the likelihood that the performance of each security will contribute to the investment objectives of the client.

Brokerage statements are generated no less than quarterly, and are sent directly from the account custodian. These reports list the account positions, activity in the account over the covered period, and other related information. Clients are also sent confirmations following each brokerage account transaction either by mail or email based on client preference.

The Firm will provide consolidated investment reports of all managed assets, including performance results, and may include updates to our internal economic forecast and any changes to investment strategy. Financial planning and Wealth management clients will receive quarterly investment updates on all managed investment accounts. Investment Management only clients will receive semi-annual investment updates.

Client Referrals and Other Compensation

Incoming Referrals

The Firm has been fortunate to receive many client referrals over the years from satisfied clients, estate planning attorneys, accountants, and family and friends of

employees. The firm does not compensate any party for these referrals or introductions.

The Firm receives an economic benefit from Schwab in the form of supportive products and services made available to us and other independent investment advisors that have their clients maintain accounts at Schwab. The availability of Schwab's products and services is not based on us providing particular investment advice, such as buying particular securities for our clients. In other words, the Firm's investment philosophy is completely independent and not biased by our relationship with Schwab or any other custodian.

Outgoing Referrals

The Firm does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them. The Firm only asks for expert and valued advice for mutual clients.

Custody

Account Statements

Under government regulations, we are deemed to have custody of your assets if you authorize us to instruct Schwab to deduct our advisory fees directly from your account. Schwab and other qualified custodians maintain actual custody of your assets. You will receive account statements directly from those custodians at least quarterly. They will be sent to the email or postal mailing address on record. You should carefully review those statements promptly when you receive them. We also urge you to compare Schwab's account statements to the periodic portfolio reports you will receive from the Firm.

Advisory Fees

Most clients prefer to pay advisory fees direct from their managed investment accounts with Charles Schwab, allowing investment reports to reflect current positions and growth, net after fees. After providing account reviews and reports to clients on quarterly or semi-annual schedules, the Firm waits 3-5 business days to provide Schwab a methodology and breakdown of client fees submitted for payment. Schwab monitors the fee amounts and discloses the amounts to client both online and on monthly statements. The Firm does accept and keep custody of client funds, typically for management of employer sponsored retirement plans and providing client services such as investment account depositing and handling security certificates. The Firm's custody status also includes the authorized deduction of client fees from a qualified custodian.

Bank Account Access

Clients are frequently provided net worth statements that contain approximations of bank account balances provided by the client, as well as the value of land and hard-to-price real estate. The Firm is not permitted to maintain access to these accounts due to bill payment features allowing potential unauthorized withdraw of funds. The net worth statements are used for long-term financial planning where the exact values of assets are not material to the financial planning tasks.

Investment Discretion

Discretionary Authority for Trading

The Firm accepts discretionary authority to manage investment accounts on behalf of clients. The Firm has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. When requested by new or existing clients, the Firm will provide written recommendations to the client prior to each trade to obtain approval if a discretionary trading authorization has not been given.

The client initially approves the custodian (i.e. Charles Schwab Institutional) to be used and the individual trading fees paid to the custodian for certain institutional trades. The Firm does not receive any portion of the transaction fees or commissions paid by the client to the custodian.

Discretionary trading authority facilitates placing trades in accounts on behalf of clients so that the Firm can promptly implement and rebalance the asset allocation strategy previously approved in writing.

Clients may suggest or place restrictions on selling or buying certain securities held in accounts for personal, political, or sentimental reasons. This is common with large concentrated company or inherited stock positions.

Procedures Prior to Investment Discretion

A signed limited power of attorney (LPOA) on file with each custodian provides trading authorization for implementing recommendations on behalf of clients. This LPOA is typically contained in the initial account opening language and is a condition of opening the account.

Prior to the Firm selling or buying any securities on behalf of new clients, a risk tolerance assessment and discussion are held to design a personalized portfolio asset allocation plan. The asset allocation plan represents the strategic, or long

term, portfolio weightings and act as the basis for most profit taking and portfolio rebalancing decisions.

Voting Client Securities

Proxy Votes

Even when the Firm has the written authority to act on or make proxy-voting instructions, it is the policy of the Firm to NOT vote proxies for client securities. Unless otherwise instructed by the Firm, clients are expected to vote their own proxies. The custodian holding the security will provide pertinent details of each proxy to clients by mail or email.

When assistance on voting proxies is requested, the Firm will provide recommendations to the client. In the rare case when a conflict of interest may arise, it will be disclosed to the client.

Financial Information

Financial Condition

The Firm does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients. Additionally, the Firm does not publish its financial statements because of non-custody status. In other words, the Firm does not serve as a custodian for client funds or securities, and does not require prepayment of fees of more than \$1,200 per client, and six months or more in advance.

Business Continuity Plan

General

The Firm has a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications, services or key people.

Disasters

The Business Continuity Plan covers natural disasters such as snow storms, tornados, and flooding. The Plan covers man-made disasters such as loss of

electrical power, fire, biological event, Internet outage, and aircraft accident. Electronic files are backed up daily and archived offsite with company principals.

Alternate Workspace

Alternate workspaces are identified to support ongoing operations in the event the main office is unavailable. It is our intention to contact all clients within five days of a disaster that dictates moving our office to an alternate location. In the event of a disaster when telephone and email communications are unavailable, but the internet is functional, alternate contact information will be posted on our company website with two days.

Information Security Program

Information Security

The Firm maintains and updates annually an information security policy and program to reduce the risk that client personal and confidential information may be breached. The Firm's employees receive on-going training in order to protect the integrity of physical and electronic client information.

Privacy Notice

The Firm is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us.

The categories of non-public information that we collect may include information about personal finances, client health information to the extent needed for the financial planning process, and information from consumer reporting agencies, e.g., credit reports. We use this information to help clients specifically state their goals, comprehensively plan to meet those goals, and adjust each client's financial plan along the way.

With client permission, we disclose limited information to attorneys, accountants, and mortgage lenders with whom the client has established a relationship. Clients may opt out from our sharing information with these nonaffiliated third parties by notifying us at any time by telephone, mail, fax, email, or in person. Based on the initial account opening process, a limited amount of information is shared with Charles Schwab in order to legally maintain a securities account and execute securities transactions.

The Firm maintains a secure office to ensure that client information is not placed at unreasonable risk. The Firm employs a firewall barrier, secure data encryption

techniques and authentication procedures in our computer environment. We do not house your personal information outside our office except on backup media.

The Firm does not provide personal information to mailing list vendors or solicitors. We require strict confidentiality in our agreements with unaffiliated third parties that require access to client information, including technology consultants, and auditors. However, properly identified federal and state securities regulators may review our company records and personal records of clients as permitted by law.

Personally identifiable information will be maintained for all active clients, and for the required period thereafter that records are required to be maintained by federal and state securities laws. After that time, information may be destroyed.

The Firm will notify each client in advance if our privacy policy is expected to change. The Firm is also required by law to deliver a *Privacy Notice* annually to clients, in writing.

Brochure Supplement (Part 2B of Form ADV)

Education and Business Standards

The Firm requires that advisors who render investment and financial planning advice are required to have a bachelor's degree and further coursework demonstrating knowledge of financial planning and tax planning. Examples of acceptable coursework include: CFP®, CFA, MBA, ChFC, JD, CTFA, EA or CPA. Additionally, advisors must have work experience that demonstrates their aptitude for financial planning and investment management.

Professional Certifications

Employees have earned certifications and credentials listed below:

Certified Financial Planner (CFP®):

Certified Financial Planners™ are licensed by the CFP Board to use the CFP mark by meeting these requirements:

- Bachelor's degree from an accredited college or university.
- Completion of the financial planning education requirements set by the CFP Board (www.cfp.net).
- Successful completion of the 10-hour CFP® Certification Exam.
- Three-year qualifying full-time work experience.
- Successfully pass the Candidate Fitness Standards and background check.
- 30 hours of related continuing education every 2 years.

Certified Public Accountant (CPA):

A Certified Public Accountant is an individual who has passed the uniform CPA examination administered by the American Institute Of Certified Public Accountants, and who has received state certification to practice accounting by meeting the following requirements:

- Bachelor's degree with a minimum of 24 hours of accounting courses. Additionally, there must be at least 18 hours of related classes such as business law and management.
- Two years of general accounting experience under the direction of an actively licensed CPA.
- Pass the four sections of the comprehensive uniform CPA examination.
- Pass the American Institute of CPAs professional ethics exam with a score of 90 percent.
- Abide by the uniform code of ethics and complete 120 hours of Continuing Professional Education every three years.

Certified Trust Financial Advisor (CTFA):

The Certified Trust Financial Advisor recognizes a standard of knowledge and competence for the trust and wealth advisory field. Professionals holding the CTFA designation obtain excellent knowledge in the areas of fiduciary and trust activities, financial planning, tax law and planning, investment management, and ethics. A CTFA designee has met the following requirements:

- Minimum of 5 years' experience in wealth management and a bachelor's degree from an accredited college or university, or
- A letter of recommendation from the advisor's manager attesting to the advisor's qualifications and ethical character.
- Candidate must sign and adhere to ICB's Professional Code of Ethics statement.
- Complete 45 credit hours of continuing education courses every three years in specified knowledge areas.

Certified Exit Planning Advisor (CEPA):

The Certified Exit Planning Advisor (CEPA) program was created by the Exit Planning Institute (EPI) and is the most widely accepted and endorsed professional exit planning credential in the world. The EPI is the premier international membership organization serving the educational needs of the exit planning profession, and to bring together financial advisors, business brokers, attorneys, and other business advisors to draw upon their combined expertise to better serve the needs of small and mid-sized business owners worldwide. The common thread uniting these different professionals is their commitment to helping clients exit their companies successfully. To earn the CEPA designation, a professional must

- Attend a 5 day executive MBA style program held twice per year in Chicago.
- Successfully pass the 3.5 hour proctored exam.
- The CEPA must be renewed every 3 years and requires 40 hours of exit-planning related continued education.

Accredited Investment Fiduciary® (AIF):

The Accredited Investment Fiduciary® professional designation is the industry's first and only designation that demonstrates knowledge and competency in the area of fiduciary responsibility and communicates a commitment to standards of investment fiduciary excellence.

- Holders of the AIF® mark have successfully completed a specialized program on investment fiduciary standards and subsequently passed a comprehensive examination.
- Demonstrate the focus on all the components of a comprehensive investment process, related fiduciary standards of care, and commitment to excellence.

- Represents a thorough knowledge of and ability to apply the fiduciary Practices.
- Designees must sign and agree to abide by a code of ethics and complete a continuing education requirement annually.

DAVID WILDER, CFP®, CTFA, MST, CEPA



Educational Background:

- Date of birth: May 1967
- Villanova University, 1989, Bachelor of Science in Accounting,
- Villanova University, 2001, Master of Science in Taxation
- College for Financial Planning and the Cannon Financial Institute

Business Experience:

- Total Wealth Planning, LLC (2015 – Present)
- Financial Management Group (2000 - 2015)
- The Vanguard Group (1990-2000)

No Disciplinary Information on record.

Other Business Activities:

Dave serves as an elected volunteer on the board of Cincinnati Association for the Blind.

Supervision:

Dave Wilder holds the position of Chief Investment Officer and Senior Advisor, and is supervised by Robert Siegmann, CCO. He reviews Jonathan Andre's work through frequent office interactions as well as remote interactions.

Robert Siegmann's contact information:

513-984-6696 Rob@TWPTEAM.com

ROBERT LEMMONS, CFP®, CPA, AIF™, CEPA



Educational Background:

- Date of birth: February 1969
- Northern Kentucky University, 1994, BS in Business,
- College for Financial Planning

Business Experience:

- Total Wealth Planning, LLC (2015 – Present)
- Financial Management Group (2010 - 2015)
- Wealth Dimensions Group (2000-2010)
- Kunimura, Mitchell & Co. CPA's (1996-2000)

- Barnes, Dennig & Co., CPA's (1990-1996)

No Disciplinary Information on record.

No Other Outside Business Activities.

Supervision:

Rob Lemmons holds the position of Director of Financial Planning and Senior Advisor and is supervised by Robert Siegmann, CCO. He reviews the work of Joel Musser, Wealth Advisor, and Chris Allen, Financial Planner Associate, and Kristin Wiechert, Financial Planning Administrator, through personal meetings and email discussions.

Robert Siegmann's contact information:

513-984-6696 Rob@TWPTeam.com

ROBERT SIEGMANN, MBA



Educational Background:

- Date of birth: September 1976
- Xavier University, 2012, MBA
- Xavier University, 2008, BSBA in Finance
- University of Cincinnati, 2003, Associate of Arts
- FINRA Series 65 Investment Advisor Representative

Business Experience:

- Total Wealth Planning, LLC (2015 to Present)
- Financial Management Group (1994 - Present)
- M.L. Roberts & Co. CPA (1993-1995)

No Disciplinary Information on record.

No Other Outside Business Activities.

Supervision:

Rob Siegmann holds the position of Chief Operating Officer, Chief Compliance Officer, and Senior Advisor and is supervised by David Wilder, CIO. He reviews the work of Chrissie Smith, Operations Manager, and Kelly Boone, Client Service Associate, through personal meetings, office interactions, and review of procedures.

David Wilder's contact information:

513-984-6696 Dave@TWPTeam.com

JONATHAN ANDRE, CFP®



Educational Background:

- Date of birth: November 1981
- Xavier University, 2004, BSBA in Finance

Business Experience:

- Total Wealth Planning, LLC (2015 to Present)
- Financial Management Group (2002 - Present)

No Disciplinary Information on record.

No Other Outside Business Activities.

Supervision:

Jon Andre holds the position of Wealth Advisor and is supervised by David Wilder, CIO.

David Wilder's contact information:

513-984-6696 Dave@TWPTeam.com

JOEL MUSSER, CFP®

Educational Background:

- Date of birth: July 1985
- Xavier University, 2013, Certified Financial Planner
- Hillsdale College, 2007, Bachelor of Arts in Economics

Business Experience:

- Total Wealth Planning, LLC (2015 to Present)
- PNC Bank (2014 - 2015)
- JP Morgan Chase Bank (2009 - 2014)
- Northwestern Mutual (2007 – 2008)

No Disciplinary Information on record.

No Other Outside Business Activities.

Supervision:

Joel Musser holds the position of Wealth Advisor and is supervised by Rob Lemmons.

Rob Lemmons contact information:

513-984-6696 rlemmons@twpteam.com

CHRISSIE A. SMITH, MBA



Educational Background:

- Date of birth: May 1980
- Indiana Wesleyan University, 2010, MBA
- Indiana Wesleyan University, 2008, BSBA in Management
- FINRA Series 65 Investment Advisor Representative

Business Experience:

- Total Wealth Planning, LLC (2015 to Present)
- Financial Management Group (1998 - 2015)

No Disciplinary Information on record.

No Other Outside Business Activities.

Supervision:

Chrissie holds the position of Operations Manager and is supervised by Rob Siegmann. Ms. Smith reviews the work of Administrative Assistants Natalie Pham and Joanne Askren.

Rob Siegmann contact information:

513-984-6696 rob@TWPTTEAM.com