Disclosure Brochure

(Part 2A of Form ADV)

TOTAL WEALTH PLANNING, LLC

4665 Cornell Rd, Suite 160

Cincinnati, OH 45241

513-984-6696 (Call / Text)

866-672-8251 (Fax)

www.twpteam.com

ROB@TWPTEAM.COM

This Form ADV2A ("Disclosure Brochure") provides information about the qualifications and business practices of Total Wealth Planning, LLC ("the Firm" CRD# 174434). If you have any questions about the contents of this Disclosure Brochure, please contact us via phone or text 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 U. S. 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. This Disclosure Brochure provides information through Shoreline to assist you in determining whether to retain the Advisor.

Additional information about the Firm and its Advisory Persons is available on the SEC's website at www.adviserinfo.sec.gov by searching with our Firm name or our CRD# 174434.

September 19, 2023

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 following material changes have been made to this Disclosure Brochure since the last filing and distribution to Clients:

- The Advisor has established an institutional relationship with Fidelity as a second custodian.

Full Brochure Available

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

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Advisory Business

Total Wealth Planning, LLC ("Total Wealth Planning" or the "Firm") is an independent, registered investment advisor with the U.S. Securities & Exchange Commission ("SEC"). The Firm is organized as a Limited Liability Company ("LLC), formed in January 2015.

Total Wealth Planning acquired the wealth advisory process and client relationships of Financial Management Group, Inc., a former SEC registered investment advisor, on April 15, 2015. The Firm assumed the advisory role over the former Clients of Financial Management Group, Inc. and continues to help Clients address their financial concerns, and provide them with answers about how to reach their lifetime goals. The Firm's approach combines comprehensive financial planning with investment advisory services in order to fulfill the wealth planning needs of Clients.

Since the Firm is focused on fee-only wealth 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 utilizes independent third party custodians (e.g. Charles Schwab, Fidelity, TIAA-CREF, my529, etc.) for safe keeping of client accounts and funds, but does accept "custody" in the eyes of the SEC for purposes of managing client accounts held with an employer plan. The Firm places trades for Clients under a limited power of attorney or utilizing access to a third party website with the client's login credentials. The client always maintains asset distribution control.

The Firm operates two offices located in Blue Ash, Ohio and Carmel, Indiana.

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.

The initial no-obligation meeting, which may be by in person, zoom or telephone, is free of charge and is considered an exploratory interview to determine the extent to which wealth planning services may be beneficial to the client.

Total Wealth Planning acts as a fiduciary to Clients, as defined under the applicable laws and regulations. As a fiduciary, the Firm upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. The Firms fiduciary commitment is further described in our Code of Ethics. For more information regarding our Code of Ethics, see page 14 of this brochure.

Retirement Accounts – When Total Wealth Planning provides investment advice to Clients regarding ERISA retirement accounts or individual retirement accounts ("IRAs"), Total Wealth Planning is a fiduciary within the meaning of Title I of the Employee Retirement Income Security Act ("ERISA") and/or the Internal Revenue Code ("IRC"), as applicable, which are laws governing retirement accounts. When deemed to be in the Client's best interest, Total Wealth Planning will provide investment advice to a Client regarding a distribution from an ERISA retirement account or to roll over the assets to an IRA, or recommend a similar transaction including rollovers from one ERISA sponsored Plan to another, one IRA to another IRA, or from one type of account to another account (e.g. commission-based account to fee-based account). Such a recommendation creates a conflict of interest if Total Wealth Planning will earn a new (or increase its current) advisory fee as a result of the transaction. No client is under any obligation to roll over a retirement account to an account managed by Total Wealth Planning.

Principal Owners

Total Wealth Planning, LLC is primarily owned by three principals, Robert Siegmann, Robert Lemmons, and David Wilder are the primary owners. Additional minority owners are: Jon Andre, Joel Musser and Chris Allen. The Firm is dedicated to employee ownership and remaining independent to serve clients.

Types of Advisory Services

Total Wealth Planning provides comprehensive wealth planning services to individuals, high net worth individuals, small businesses, charitable organizations and retirement plans on matters not involving securities, such as cash flow and net worth analysis, tax planning and projections, independent and objective insurance needs analysis and policy reviews, comprehensive college goal and funding services, executive compensation analysis and guidance, retirement goal setting and roadmap development, and multigenerational estate planning and charitable giving strategies.

Total Wealth Planning also provides investment supervisory services, also known as asset management services utilizing an investment philosophy grounded in diversification above timing and security selection.

As of December 31, 2022, the Firm manages the following assets for its Clients:

Discretionary Assets:	Non-Discretionary Assets:	Total Assets:
$819,273,410	$46,541,962	$865,815,372

Tailored Relationships

Each client's goals and objectives are discussed and incorporated into the individual plan tailored to each specific client. A comprehensive document titled "Total Wealth Plan" is initially created for "Wealth Advancement" and "Wealth Legacy" Clients (see service offerings below) to address all aspects of a client's financial life. This comprehensive overview is updated and utilized for each meeting held with these Clients. An abbreviated version is maintained for investment centric clients (e.g. Foundation and Flexible service offerings).

Portfolio asset allocation policy statements are created that reflect the goals, age, net worth, and individual client risk tolerances. Clients may impose restrictions on divesting or investing in certain securities or types of securities.

Agreements may not be assigned without the client's prior consent.

Types of Agreements

Total Wealth Planning offers individual Clients three distinct levels of wealth management services as described below:

Wealth Foundation Plan: Offers Clients an investment management program combined with goal setting exercises and holistic checkups to accumulate and preserve wealth for achieving a lifetime of security and independence. This agreement has a minimum fee of $750 per quarter and is most appropriate for Clients with $250,000 or more of investable assets, including employer 401k plans.

Wealth Advancement Plan: Advances planning services beyond investment services to include proactive and comprehensive financial planning services in the areas of insurance analysis, tax reduction planning, and other estate planning issues. This agreement has a minimum fee of $2,250 per quarter and is most appropriate for Clients with $750,000 or more of investable assets, including employer 401k plans.

Wealth Legacy Plan: Offers a coordinated, experienced team of wealth, legal and business planning professionals to oversee and protect the family assets and legacy. This agreement has a minimum fee of $5,000 per quarter and is most appropriate for Clients with $2,000,000 or more of investable assets, including employer 401k plans.

Total Wealth Planning offers two additional types of agreements to Clients, but are primarily used to accommodate the needs of children and businesses of existing Clients.

Flexible Portfolio Management: Offers a professionally designed and monitored investment only solution, but with a significantly reduced annual minimum fee of $750. This service offering is typically reserved for children of existing Clients or for high income families looking to quickly build their investment portfolio (and relationship) with an independent, fee-only firm such as Total Wealth Planning.

Retirement Plan and Institutional Plan Advisory: Offers an institutional class retirement plan and investment management services for small business plans and non-profits entities, typically connected to existing Clients.

Wealth Foundation Plan Offering

For clients with $250,000 to $750,000 of managed assets.

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 Wealth Foundation Plan ("Foundation") offering is focused on preserving and building the client's investment portfolio value while also providing 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 are:

- Goal setting exercises for both college and retirement planning needs.
- Consolidating and simplifying the client's investment portfolio and tax reporting process.
- Investment risk tolerance assessment, portfolio asset allocation design and implementation.
- Analysis and management of employer based retirement plans (i.e. 401k, 403b)
- Ongoing portfolio monitoring and rebalancing, including tactical changes that reflect the Firm's economic analysis and outlook.
- Annual review meeting with Certified Financial Planner™.
- Custody and monthly reporting from a "qualified custodian". Quarterly (or semi-annual) consolidated investment reporting, including current and historical performance results, by The Firm.
- Preparation of Net Worth financial statements 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. Assets are invested primarily in reduced 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 and Fidelity may charge a transaction fee for the purchase of most institutional class mutual funds. The Firm does not receive any compensation, in any form, from fund companies.

To meet specific client needs and to position Clients during challenging economic periods, recommended securities may also include: equities (stocks), corporate and U.S. government debt securities, certificates of deposit, municipal securities, variable annuities, and option contracts. 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 Foundation and Flexible Portfolio service offerings, at a maximum $250/hour fee. 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 Foundation Plan, or other service offerings.

Wealth Advancement Plan Offering

For clients with $750,000 to $2,000,000 of managed assets.

The Wealth Advancement Plan ("Advancement") offers all services included in the Foundation service offering, then adds comprehensive financial planning services to an investment management service. Realistic and measurable goals are set and a custom plan is created and communicated to reach those goals. As goals and objectives change over time, suggestions are made and implemented on an ongoing basis.

The scope of work for the Advancement plan includes:

- Expanded Portfolio Diversification and asset location services to accommodate the larger portfolio's need for risk reduction and additional tax efficiency.
- Executive Compensation and Stock Option analysis and guidance.
- Tax planning and formulation of tax reduction strategies.
- Retirement accumulation and distribution strategy analysis.
- Insurance Needs & Coverage Analysis.
- Estate plan design and document review
- Charitable & Family Gifting strategies

Clients and prospects may request a complete list of services offered under the Advancement Plan, or other service offerings.

Wealth Legacy Plan Offering

For clients with greater than $2,000,000 of managed assets.

The Wealth Legacy Plan ("Legacy") offers all services included in the Foundation and Advancement plan 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. The Firm also aligns its community support behind the philanthropic desires of Legacy Clients with contributions of time, treasure or other pro-bono efforts.

Clients 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. Legacy Clients are also offered "Family Office" type services via vetted third parties for bill paying, tax preparation and document scanning and warehousing.

Clients and prospects may request a complete list of services offered under the Legacy Plan, or other service offerings.

Flexible Portfolio Management Overview

Flexible Portfolio Management: Offers a professionally designed and monitored investment only solution for the emerging wealthy, but whose current investment portfolio may not be large enough to justify the minimum fees with traditional service offerings. This service offering is typically reserved for children of existing Clients or for high income families looking to quickly build their investment portfolio (and relationship). Advisor will utilize Schwab Performance Technologies as the program sponsor to provide this service.

The scope of work for the Flexible Portfolio includes:

- Investment risk tolerance assessment, portfolio asset allocation design and implementation.
- Ongoing monitoring and rebalancing back to original portfolio weightings.
- Custody of assets at a "qualified custodian", with statement, web or mobile application access.
- Education and guidance about types of accounts and eligibility for annual contributions.
- Annual Review session with a registered financial advisor.

The annual fee for the Flexible Portfolio is 1.25% of assets under management and subject to a minimum fee of $750 per year.

Clients and prospects may request a complete list of services offered under the Flex Plan, or other service offerings.

Retirement and Institutional Plan Advisory

Retirement Plan Advisory Services: The Firm provides 3(21) retirement plan advisory services on behalf of the retirement plans (each a "Plan") and the company (the "Plan Sponsor"). The Advisor's retirement plan advisory services are designed to assist the Plan Sponsor in meeting its fiduciary obligations to the Plan and its participants ("Plan Participants"). Each engagement is customized to the needs of the Plan and Plan Sponsor. Services generally include:

- Employee Enrollment and Education Tracking
- Investment Policy Statement ("IPS") Support
- Investment Due Diligence and Oversight
- Ongoing Investment Recommendation and Assistance
- Plan Sponsor consulting and sharing of Fiduciary Responsibility.

These services are provided by the Firm serving in the capacity as a fiduciary under the Employee Retirement Income Security Act of 1974, as amended ("ERISA"). In accordance with ERISA Section 408(b)(2), the Plan Sponsor is provided with a written description of the Firm's fiduciary status, the specific services to be rendered and all direct and indirect compensation the Advisor reasonably expects under the engagement.

Institutional (Non-Profit or Charitable) Investment Management Services:

- Establishing appropriate portfolio structure
- Development of Investment Policy Statement

- Ongoing monitoring and portfolio rebalancing
- Portfolio reviews with client or board members.
- Assistance with donor gifting and planned giving strategies

Fees and Compensation

Individuals & Families

Total Wealth Planning charges fees based 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 minimum fees by service offering:

Flexible Portfolio Management = $750 per Year

Wealth Foundation Plan = $750 per Quarter

Wealth Advancement Plan = $2,250 per Quarter

Wealth Legacy Plan = $5,000 per Quarter

Clients who choose more comprehensive financial planning services without the suggested minimum assets are likely to pay a higher annual rate (%) than listed above. With the exception of a client paying a minimum fee, no client in good standing will pay an advisory fee rate higher than what is listed above.

Fees are negotiable in circumstances when multiple client relationships result from the same immediate family. There are some long term existing Clients who may be grandfathered under previous fee agreements not listed above.

Retirement and Institutional Plan Advisory

Fees for retirement plan or other institutional advisory services are charged an annual asset-based fee ranging from 0.50% to 1.00% per annum. Fees are assessed and payable quarterly, in arrears, and based on the ending value of each period. Fees are determined depending on plan assets, number of participants and complexity of the Plan.

All charitable purpose accounts (i.e. Donor Advised Funds, Scholarships, Non-Profit owned accounts, etc.) are billed at a reduced rate of 0.50% per year. This is one way we can help support the efforts of our Clients who are active in philanthropic and community programs.

Fee Billing

Individuals and Families

Wealth Planning Advisory fees are billed quarterly, and are calculated based on the average daily balance of the managed portfolio for the calendar quarter.

From a timing perspective, Clients will receive a quarterly report by the 15th calendar day following the close of each calendar quarter. In practice, a client will receive their 4th quarter report by January 15th for the advisory period of October 1st thru December 31st. Similar timing should be expected for the 1st, 2nd and 3rd quarters, with reports delivered by April 15th, July 15th and October 15th, respectively.

The advisory fee will be calculated using the average daily balance of the managed portfolio for the previous 3 months. For example, a client should expect to receive their 4th quarter investment report by January 15th with a value ending December 31st. The advisory fee covers all investment management, financial planning, and servicing, and will be calculated using the average daily balance of the managed portfolio from October 1st to December 31st. Similar calculation methodology should be expected for the 1st, 2nd and 3rd quarters. The fee is calculated on a percentage basis by dividing the annual fee rate by four, then multiplying by the average daily balance of the assets under management.

Total Wealth Planning will deduct the quarterly fee, proportionally, across eligible client accounts except in the case of Roth IRA's, employer based 401ks, or when the client specifically requests alternate payment arrangements, including payment by check or Venmo. The client must consent in advance to direct debiting of their investment account. Payment in full is expected within 30 days of invoice presentation.

Flexible portfolio (e.g. Investment only) Clients are billed on a semi-annual basis

The Firm is engaged by approximately 90 Clients for investment only services, where the billing process is different than what is described above. These Clients are separated into two groups: those who are managed using the Schwab Intelligent Institutional Platform ("IIP"), or other smaller Foundation level clients.

For clients who are managed on the IIP platform, the semi-annual investment communications and invoices will be delivered in March and September each year. The March communication will include a semi-annual fee calculated using the period end value on the last business day of February for management services from Jan 1 to Jun 30. The September communication will include a semi-annual fee calculated using the period end value on the last business day of August for management services from July 1 to Dec 31. Based on the process described above, an investment only client will pay in arrears for 2 months, and prepay for the remaining 4 months. The fee calculation process does not take into account deposits or withdrawals, and instead utilizes a snapshot of value (2/28 and 8/30) as the basis of calculating the management fee.

For smaller foundation clients, the semi-annual investment communications will be delivered in January and July each year, with an invoice for services rendered in arrears. The January communication will include a semi-annual fee calculated using the average daily balance of the prior six month period (Jul 1 to Dec 31). The July communication will include a semi-annual fee calculated using the average daily balance of the prior six month period (Jan 1 to Jun 30).

Retirement Plan Advisory Services

The Firm is compensated for its services at the end of the quarter after advisory services are rendered. Fees may be directly invoiced to the Plan Sponsor (or Organization) or deducted from the accounts directly, depending on the terms of the advisory agreement. Vanguard is typically the recommended custodian for retirement plans.

Other Fees

The Client is responsible for all securities execution and custody fees charged by Charles Schwab, Fidelity, or any other custodian, if applicable. The Firm's recommended custodians, Schwab and Fidelity, do not charge securities transaction fees for ETF and equity trades in a client's account, provided that the account meets the terms and conditions of Schwab's or Fidelity's brokerage requirements. However, the custodian typically charges for mutual funds and other types of investments. The selection of the security our philosophy deems as more important than the nominal fee the custodian may charge.

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, negotiations with Clients, etc.).

Expense Ratios

All mutual funds and ETFs include a management fee for their services as investment managers. These fees are referred to as the expense ratio and is disclosed in the fund's prospectus or by reviewing the fund's profile on any popular finance website, such as Google finance or Morningstar. The expense ratio pays for management expenses, including salaries, general fund expenses such as overhead, and possibly distribution fees for marketing. 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 our Firm.

A goal of the Firm's investment methodology is to reduce costs as much as possible, but not to the detriment of improving diversification and expected performance.

Many mutual funds have a variety of different share classes (e.g. A, B, C, F, I) that may carry different expenses on the front-end, back-end or ongoing. The Firm will only use no-load (i.e. no sales charges or commissions) share classes, and will utilize the lowest internal cost class available given the client's specific situation. As an example, if an Institutional share class is available at a reduced internal cost, but requires a Schwab transaction cost stated under the section above (Other Fees), our investment professionals will typically use only for positions of $5,000 or more that are not anticipated to have much activity over the course of a year. Otherwise, for clients who are adding or distributing on a regular basis, a no-load, no transaction fee share class will be utilized until such time the balance is large enough to transition into a lower cost institutional class.

Since each Client portfolio is unique, the actual internal costs of each portfolio varies based on the portfolio allocation and type of funds used. Additionally, each service offering may utilize different funds to achieve efficiency goals for tax & portfolio management purposes. With this said, the average weighted internal fund expenses for clients range from 0.05% to 0.41%.

Past Due Accounts and Termination of Agreement

Each service offering is an ongoing agreement between the Firm and the client, with the length of engagement being 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.

The Firm reserves the right to stop work on any account where the client has not responded to payment requests and the client is more than 90 days overdue in its fee payments. 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 necessary and appropriate to provide proper financial advice. Upon written notice of termination, any unused portion of fees collected in advance will be refunded within 30 days.

With respect to Retirement Plan Advisory Services fees, either party may request to terminate their services, at any time, in whole or in part, by providing advance written notice to the other party. The Client shall be responsible for investment advisory fees up to and including the effective date of termination. The Client's retirement plan services agreement with the Advisor is non-transferable without the Client's prior consent.

Upon the death of a spouse, the agreement will be maintained as is for the surviving spouse. Upon the death of a client without a surviving spouse, the agreement will be terminated and replaced with project based services to assist the executor, trustee and/or beneficiaries with setting up accounts and making distributions according to beneficiaries and estate plan documents on file.

Performance Based Fees

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

Types of Clients & Account Minimums

Description

Total Wealth Planning provides comprehensive wealth management (including investment advice and financial planning) to high net worth individuals & families, small businesses, non-profit and charitable organizations. 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 Wealth Legacy Plan 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).

The Wealth Advancement Plan 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 Wealth Foundation Plan 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 Flexible Portfolio Management (i.e. investment only) offering requires a minimum annual fee of $750 and is suggested as an appropriate offering for prospective Clients with greater than $60,000 in investable assets.

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.

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.

Investment Philosophy and Risks

Investment Philosophy

Total Wealth Planning's investment philosophy is grounded in the research by academics and Noble Laureates that believe diversification and low-cost are paramount over all other investment methods and strategies.

This academic research, backed by decades of historical data, clearly show:

1. Market timing and individual stock picking does not provide additional risk adjusted returns over longer periods of time.
2. Increased investment costs leads to over two-thirds of the mutual fund managers to underperform their benchmarks in any given year.

The Firm does not focus research capabilities on individual stocks or the current noise in the daily media. Rather, we focus research efforts on macroeconomic factors on a worldwide basis using economic data provided by the Federal Reserve System, Bureau of Labor Statistics, and other public or government data.

Other sources of information that the Firm may use include J.P. Morgan quarterly guide to the markets, Fritz Meyer Financial economist, Charles Schwab & Company's economic and equity research, and Morningstar mutual fund information.

Investment Process

Total Wealth Planning's investment process starts with client discussions about goals, time horizon, cash flow needs and appetite for risk. These initial discussions are translated into a carefully structured portfolio of asset classes to achieve an appropriate rate of return to meet the client's financial planning objectives, with emphasis on reducing the level of risks taken.

The initial portfolio structure, once approved, is used as an investment policy statement and then implemented across the client's supervised portfolio, keeping asset location and tax efficiency top of mind. This is what we call the client's **strategic portfolio allocation** and acts as the foundation for future investment decisions. Portfolios are globally diversified to reduce risk by expanding diversification beyond traditional home country markets.

The Firm then fills each asset class using a core and satellite approach, meaning we use primarily low cost 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. The portfolios are closely monitored by systems and advisors to watch for opportunistic rebalancing to systematically “sell high and buy low” and thereby, restore the managed portfolio to the **strategic portfolio allocation**.

Occasionally, our economic analysis and investment outlook will result in making a **tactical shift** to the client’s original portfolio structure to either profit or defend from the current economic environment. Once this investment theme has played out (or not), the portfolio’s **strategic** targets remain the goal for the long-term.

The portfolio structure and strategy for a specific client is based upon the objectives stated by the client during ongoing discussions and responses on risk tolerance assessments. The Firm will conduct a formal risk tolerance assessment no less than every 5 years. However, the client may revisit risk, goals, or objectives with the Firm at any time.

Risk of Loss

All investment approaches have 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 broad diversification. All investors face the following investment risks:

- Interest-rate Risk: changes in prevailing interest rates may cause bond 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 next year will not buy as much as a dollar today will. This is because purchasing power is eroded 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, publicly traded securities (i.e. stocks, mutual funds, ETFs) are liquid within days, and real estate properties are highly illiquid, taking months (or years) to convert to cash.

- 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 Clients. The Firm conducts 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. Additional information about the Firm and its Advisory Persons is available on the SEC's website at www.adviserinfo.sec.gov by searching with our Firm name or our CRD# 174434.

The Firm is also 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 objectivity and to minimize any conflicts of interest.

Code of Ethics and Personal Trading

Code of Ethics

The Firm and those subject to its compliance program (our "Supervised Persons") have committed to a Code of Ethics ("Code") that is available for review by Clients and prospective Clients. The Firm and its Supervised Persons 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.

Supervised Persons are required to review and comply with all other provisions of the Firm's *Compliance Manual*.

Insider Trading

Use of material non-public information for personal gain is illegal and unethical. It is the policy of the Firm that Supervised Persons with access to client holdings and trading information (our "Access Persons") 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, regardless of their official insider status, who may potentially provide us with inside information. A watch list of applicable stocks is maintained and updated quarterly as Clients meeting this criteria change jobs or engage the Firm. A review of all Access Person 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 personal trading activity of all Access Persons (i.e. employees with access to client interactions and data). Mr. Siegmann's personal trades are monitored and reviewed by David Wilder. The personal trading reviews ensure that Access Persons adhere to the Firm trading policies and that clients of the Firm are not negatively affected in any way. Since most Access Person 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 Access Persons are permitted to buy or sell mutual funds or other securities that are also recommended to Clients. Firm Access Persons typically invest their own money in the same strategy and mutual funds that are recommended to Clients. Access Persons are not permitted to "Front-Run Trades", or purchase any non-mutual fund securities for their own accounts ahead of client trades.

Conflicts of Interest

The Firm acknowledges that some conflicts of interest exist in a client relationship. Known conflict are stated below:

When clients choose to **make a large purchase** (e.g. real estate, cars, etc.) and consider funding options such as debt versus using their savings or investment, a conflict of interest exists. Advisors with the Firm are instructed to outline the pros/cons of each option in writing, then allow the client to make an informed decision whether to borrow at low, attractive interest rates, or to take a portfolio withdrawal that may incur capital gains or taxes. Any portfolio withdrawal will reduce the value of the client's managed portfolio and also reduce future fees paid to the Firm.

When clients request a **referral to another professional** in such areas of tax, legal, insurance, real estate, or other, The Firm has a number of vetted professionals that are suggested to the client. The Firm does not accept any form of financial compensation in return for these referrals, but is encouraged to refer clients to professionals who are either clients themselves, or to those who have demonstrated a history of sending clients to seek out the services of The Firm. The Firm addresses this conflict by having a unified list of professionals that are vetted in areas of expertise, competitiveness of fees, and who demonstrate a similar set of ethics.

Clients who wish to **gift assets or utilize a Donor Advisor Fund will pay reduced fees**. Assets gifted to a charity or family member will reduce managed assets, and assets gifted into a Donor Advised Fund managed by the firm will pay a reduced fee (0.50%) on these assets.

Clients who have unmanaged **401k or pension assets** may choose to rollover these assets into a managed account by the Firm. Additions to managed assets will increase the advisory fee paid to the advisor, whereas, assets left with former employer plans typically have lower fees due to lack of proactive advice and service.

Custodial Practices

Selecting Custodial Firms

The Firm recommends Clients establish brokerage accounts with Schwab Advisor Services, a division of Charles Schwab & Co., Inc. ("Schwab") or Fidelity Clearing & Custody Solutions and related entities of Fidelity Investments, Inc., including National Financial Services, LLC and Fidelity Brokerage Services, LLC (collectively "Fidelity"). Schwab and Fidelity (each a "Custodian" and collectively the "Custodians") are FINRA-registered broker-dealers, members SIPC. The Firm is independently owned and operated and not affiliated with Schwab or Fidelity, and does not receive fees or commissions from Schwab or Fidelity. Although the Firm may recommend that Clients establish accounts at Schwab or Fidelity, it is the client's decision to custody assets with Schwab or Fidelity. However, the Firm may be limited in the services it can provide if Schwab or Fidelity are not engaged.

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 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 both the client the Firm, as discussed below *(see "Products and Services Available to Us from Schwab")*
- Cybersecurity and anti-fraud practices designed to protect client privacy and wealth.

Brokerage Costs

For our Clients' accounts, Schwab and Fidelity do not charge separately for custody services but is compensated by charging you transaction fees on mutual fund trades executed in your Schwab or Fidelity account, as applicable. Schwab's and Fidelity's trading fees applicable to our client accounts were negotiated based on the large amount of client accounts and assets maintained. This commitment benefit the client because the trading fees on institutional mutual funds are significantly less than they would be if the Firm did not have significant assets held with Schwab or Fidelity.

Best Execution

The Firm reviews the execution quality and fees charged by Schwab, Fidelity, and their competitors on an annual basis. The Firm does not receive any portion of the trading fees. The Firm also considers privacy, client security and safety, firm reputation, availability of investment choices and client service standards as part of our best execution research.

Schwab Products & Services

Schwab Advisor Services is a subsidiary serving independent investment advisory firms. They provide the Firm and its' 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. For perspective, our firm manages over $900 million in client assets, so keeping $10 million with Schwab does not create a conflict of interest.

Services that Benefit You.
Schwab's brokerage offerings include access to a broad range of investment products, execution of securities transactions, custody of client assets, and anti-fraud or cybersecurity measures. The investment products available through Schwab include many lower cost vehicles we might not otherwise have access to or that would require a significantly higher minimum initial investment by individual Clients. Schwab also provide access to client account data and duplicate statements for improved servicing capability, as well as, invites to free educational conferences and events.

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:

- Assist with back-office functions, recordkeeping and client reporting.
- Technology, compliance, legal, and business consulting;
- Discounted entrance to Schwab's IMPACT annual conference based on multiple advisor attendance.

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.

Our Interest in Schwab's Services

The availability of these services from Schwab provides benefits to both the Firm and our Clients. These services enable the Firm to direct time and energy on serving you, the client, instead of producing these services internally. We believe that our selection of Schwab as custodian is in the best interests of our Clients given the criteria above (*see "How We Select Custodians").*

Fidelity Products & Services

As noted above, Total Wealth Planning has established an institutional relationship with Fidelity to assist the Advisor in managing Client accounts. Access to the Fidelity platform is provided at no charge to the Advisor. The Fidelity platform includes brokerage, custody, administrative support, record keeping, technology, and related services designed to support registered investment advisors like Total Wealth Planning in serving Clients. These services are intended to serve the best interests of the Advisor’s Clients.

Fidelity may charge brokerage commissions (securities transaction fees) for effecting certain securities transactions. Fidelity enables the Advisor to obtain certain no-load mutual funds without securities transaction fees and other no-load funds at nominal transaction charges. Fidelity’s commission rates are generally considered discounted from customary retail commission rates. However, the commissions and transaction fees charged by Fidelity may be higher or lower than those charged by other custodians and broker-dealers.

As part of the arrangement, Fidelity also makes available to the Advisor, at no additional charge to the Advisor, certain research and brokerage services, including research services obtained by Fidelity directly from independent research companies. The Advisor may also receive additional services and support from Fidelity. As a result of receiving such services for no additional cost, the Advisor may have an incentive to continue to use or expand the use of Fidelity's services. The Advisor examined this potential conflict of interest when it chose to enter into the relationship with Fidelity and has determined that the relationship is in the best interests of the Advisor’s Clients and satisfies its Client obligations, including its duty to seek best execution.

The Advisor receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Fidelity. The software and related systems support may benefit the Advisor, but not its Clients directly. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a Custodian creates a conflict of interest since these benefits may influence the Advisor’s recommendation of this Custodian over one that does not furnish similar software, systems support, or services.

Our Interest in Fidelity’s Services

The availability of these services from Fidelity provides benefits to both the Firm and our Clients. These services enable the Firm to direct time and energy on serving you, the client, instead of producing these services internally. We believe that our selection of Fidelity as custodian is in the best interests of our Clients given the criteria above (*see “How We Select Custodians”).*

Order Aggregation

For advisors who recommend and purchase individual stocks for Clients, supply and demand dynamics may benefit Clients who purchase the recommended stock before other Clients. This is based on a higher demand creating an increase in the stock’s offering price and is most impactful with low daily volume stocks (i.e. thinly traded). The firm may aggregate orders in a block trade or trades when securities are purchased or sold through Schwab or Fidelity for multiple (discretionary) accounts in the same trading day. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage any particular Clients' accounts.

Review of Accounts

Review of Comprehensive Financial Plans

Client financial plans are comprehensive and personalized by design. Clients using 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. Annual reviews are comprehensive and include updating all aspects of client's personal net worth, employment and benefits, retirement goal setting and sustainability tracking, tax reduction strategies, college funding, 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 no less than quarterly by the Firm's centralized investment department. Clients are evenly distributed across a 13 week quarterly schedule to provide consistency of these reviews, with trades occurring no later than Friday's close each week. Furthermore, with the use of software and alerting systems, accounts are monitored daily for investment or liquidation requirements. Accounts are reviewed for consistency with the Firm's current investment strategy, the global economic conditions, and client's investment policy statement and goals. Account reviews are performed more frequently when market conditions dictate.

Review Triggers

Investment accounts are proactively reviewed no less than quarterly on a planned weekly review schedule. Reviews may also be triggered by deposits, withdrawal needs, or 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 statements 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 the 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. 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

Incoming Referrals

The Firm has been fortunate to receive client referrals over the years from satisfied Clients, estate planning attorneys, accountants, and family and friends of employees. The Firm does not compensate any unaffiliated third-party for these referrals or introductions.

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 requires these professionals to provide expert, advice for our mutual Clients. Some of these professionals engage the Firm for advisory services, but does so at the published fee schedule and rates.

Custody

Account Statements

The Firm does accept and maintains custody of certain Client accounts in cases where the Firm may have authorization pursuant to a formal engagement. All Clients must custody their assets with a "qualified custodian", meaning the Firm never holds, touches or otherwise has access to client assets.

Clients will receive account statements directly from those custodians at least quarterly, by email notice or U.S. mail. The Firm encourages Clients to compare Schwab's and Fidelity's account statements to the periodic portfolio reports you will receive from the Firm.

For more information about custodians and brokerage practices, see Brokerage Practices above.

Surprise Independent Examination: Because the Firm is deemed to have custody over certain Clients' accounts, we are required to engage an independent accounting firm to perform an annual surprise examination of those specific accounts which the Firm maintains technical custody. Any related opinions issued by an independent accounting firm are filed with the SEC and are publicly available on the SEC's Investment Adviser Public Disclosure website (http://adviserinfo.sec.gov).

Advisory Fees

Most Clients are encouraged to pay advisory fees direct from their managed investment accounts with Schwab or Fidelity. This allows 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 will provide Schwab and Fidelity a breakdown of client fees for payment. Schwab and Fidelity monitor the fee amounts and discloses the amounts to clients online and on monthly statements. The Firm will also notify clients of advisory fee calculations and amounts before they are requested for payment.

Under government regulations the Firm is deemed to have custody of your assets if you authorize the Firm to instruct Schwab or Fidelity to deduct the Firm's advisory fees directly from your account[s].

The Firm has technical custody of some client assets held in employer sponsored retirement plans. Custody is determined by having access to a client's account[s] held away from Schwab or Fidelity where the Firm uses the client's credentials to access the account[s] information. Additionally, the Firm may hold a client check or security certificate temporarily (1-2 business days) before depositing into their Schwab or Fidelity account. Lastly, our custody status also includes the authorized deduction of client fees from a qualified custodian as noted above.

Investment Discretion

Discretionary Authority for Trading

The Firm prefers discretionary authority to manage investment accounts on behalf of Clients, allowing for prompt and proactive rebalancing based on the asset allocation strategy previously approved in writing. In practice, the Firm, has the authority to determine, without obtaining specific client consent, the securities and the amount 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 is rejected.

The client initially approves the custodian (i.e. Schwab or Fidelity) 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.

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. Our process does not guarantee a profit, especially in short time periods.

Proxy Voting

Proxy Votes

Proxy voting procedures most often apply to advisors who select individual companies with specific board appointments. However, mutual funds are companies that also experience needs to make changes to their board or their investment policies that require a majority shareholder approval. It is the Firm's policy to NOT vote proxies on behalf of Clients, but we will provide guidance when requested under the following set of assumptions: Voting must be done in the best interests of all of the Firm's Clients and only for securities that are held and managed in the client's portfolio.

Unless otherwise instructed by the Firm, Clients are expected to cast their own proxy votes based on materials that will be sent direct from the investment company or custodian holding the securities.

When assistance on voting proxies is requested, the Firm will provide recommendations to the client and maintain records for the greater of 5 years or the termination of the client's engagement. In the rare case when a conflict of interest may arise, it will be disclosed to the client.

Firm Financial Condition

Financial Condition

The Firm does not require prepayment of fees of more than $1,200 per client, and six months or more in advance. Additionally, the Firm does not have any financial impairment that will preclude the Firm from meeting contractual commitments to Clients.

During the COVID-19 pandemic, the Firm was awarded a low cost federal loan under the Paycheck Protection Program to pay office rent, payroll and healthcare benefits for all of our employees.

Business Continuity Plan

General

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

Disasters

The BCP covers natural disasters such as snow storms, tornados, and flooding. It also addresses man-made disasters such as loss of electrical power, fire, biological event and internet outage. Electronic files and email systems are located offsite on a cloud based server. Client contact lists are refreshed quarterly and securely stored in the event of IT failure.

Firm employee homes can be utilized 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 any changes to meetings or accessibility to our team. In the event of a disaster when telephone and Firm email communications are unavailable, owner and key employee information is available on our public website at http://twpteam.com/emergency/ and will be broadcast to Clients via email and text.

Information Security Program

Information Security

The Firm maintains and updates annually an information security policy that protects client confidential information from loss. The Firm's employees receive on-going training in order to stay ahead of would-be criminals and are authorized to act vigilantly to protect the integrity of physical and electronic client information.

Overview of what we do to protect client data and privacy:

- Our team works together in a private physical office on desktop computers. We don't use laptops and work in public places such as Starbucks, hotel lobbies, or golf courses.
- We employ state of the art cybersecurity hardware and training using a layered approach.
- Encrypted email connections internally at firm and between Schwab and Fidelity.
- Regular cyber security training by a rotating group of outside experts
- Third party email phishing and network penetration testing, along with internal policies to check before you click on unsolicited email links.
- We utilize 2 factor authentication logins with any outside vendor where your personal information is kept, subject to the vendor's availability.
- We engage only with industry vendors who demonstrate equivalent or better approaches to cybersecurity.
- Video surveillance of physical office.
- Regular system monitoring, updates, and enhancements.
- All paper documents, notes, etc. are in locked bin until they are shred by a local vendor.
- All company related login credentials are encrypted and stored using an industry leading password manager software.
- Operational leaders stay on top of cyber events, potential threats and share with team members in a timely manner.

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 (i.e. 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 or Fidelity 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 perform due diligence on third party vendors (e.g. custodians, software and security providers) with access to your personal information outside our office.

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 set forth by federal and state securities laws. After that time, information may be destroyed. The Firm Privacy Notice is included as part of this combined disclosure document.

Total Wealth Planning, LLC. Notice of Privacy Policy

FACTS	WHAT DOES **TOTAL WEALTH PLANNING, LLC** DO WITH YOUR PERSONAL INFORMATION?
Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
What?	The types of personal information we collect and share depend on the level of service you engage with us. This information can include: ▪ Social Security number, Birthdate, address and income ▪ Account balances, assets, transaction history, and overall net worth. ▪ Budgets, Insurance policies, names of family members, estate planning documents and goals. When you close your account, we continue to handle your personal information according to our policies and applicable laws.
How?	All financial companies need to share some level of client's personal information to properly serve client needs – open investment accounts, process transactions and create and update financial plans. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Total Wealth Planning, LLC chooses to share; and whether you can limit this sharing by law.

Reasons we can share your personal information	Does Total Wealth Planning, LLC share?	Can you limit (opt out) this sharing?
For our everyday business purposes – to open and maintain your investment account and process transactions (e.g. Schwab Institutional, Fidelity, and other managed accounts)	Yes	No
For our marketing purposes –to offer our products and services to you	No	Does not share
For joint marketing with other financial companies	No	Does not share
For our affiliates' everyday business purposes – information about your transactions and experiences	No	Does not share
For our affiliates' everyday business purposes – information about your creditworthiness	No	Does not share
For our affiliates to market to you	No	Does not share
For non-affiliates to market to you	No	Does not share

FACTS	WHAT DOES **TOTAL WEALTH PLANNING, LLC** DO WITH YOUR PERSONAL INFORMATION?
Sharing practices	
How often does Total Wealth Planning, LLC notify me about their practices?	We are required to notify you about our sharing practices (privacy policy) at the initial signing of a contract and annually while you are a client. Also, when any material change in policy occurs.
How does Total Wealth Planning, LLC protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law and best industry practices. More specifically, we: • Work together in a private physical office on desktop computers. We don't carry around laptops and attempt to work at Starbucks, hotel lobbies, or golf courses. • Utilize state of the art cybersecurity hardware and training keeping a layered approach in mind. • Utilize 2 factor authentications for website logins where your accounts or data is located. • Engage only with industry vendors who demonstrate equivalent (or better) approaches to safeguarding your data and privacy. • Monitor our physical office 24/7 by surveillance cameras.
How does Total Wealth Planning, LLC collect my personal information?	We collect your personal information, for example, when you: ▪ Complete questionnaires ▪ Provide data to us physically or electronically ▪ Open and change investment accounts ▪ Deposit, withdrawal or otherwise move money
Why can't I limit all sharing?	Federal law gives you the right to limit sharing only for ▪ Affiliates' everyday business purposes ▪ Affiliates to market to you ▪ Non affiliates to market to you State laws and individual companies may give you additional rights to limit sharing. In response to a California law, we assume accounts with California addresses do not want us to disclose personal information about you to non-affiliated third parties except as permitted by California law. We also limit the sharing of personal information about you with our affiliates to ensure compliance with California privacy laws.

Contact Us	Call Robert Siegmann at 513.984.6696 or 800-542-4198. You can learn more about our firm at www.twpteam.com

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 excelled 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.

Master of Science in Taxation (MST):

The MST program is an interdisciplinary program, engaging lawyers and accountants, and is designed to provide a deep understanding of tax policies and procedures. The core E:\twp 2-bcurriculum focuses on taxation of corporations, partnerships and sole proprietorships. Elective courses provide an opportunity to focus on areas such as wealth taxes, accounting for income taxes, taxation of trusts and estates, executive compensation, charitable gift planning and employee benefits.

Behavioral Financial Advisor (BFA):

The BFA™ designation is a program offered by Kaplan learning and align financial decisions with client values, goals and habits. Managing emotions and making good decisions that are consistent with one's values is one of the most difficult parts of achieving long-term goals. By understanding their core values and the ways in which our psychology and physiology can lead us to make emotional decisions, clients can develop better skillsets for making rational decisions that are in alignment with those values, even in situations where they are experiencing strong emotions.

DAVID WILDER, CFP®, CTFA, MST, CEPA, AIF®

Educational Background:

- Date of birth: May 1967
- Villanova University, BS in Accounting (1989)
- Villanova University, Master of Science in Taxation (2001)
- College for Financial Planning and the Cannon Financial Institute (1993)

Business Experience:

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

No Disciplinary Information to disclose.

Other Business Activities: None.

Supervision: Dave Wilder is a partner of the Firm and holds the position of Chief Investment Officer and Senior Advisor. He is supervised by his partners, Robert Siegmann & Robert Lemmons. He supervises the work of Jonathan Andre.

ROBERT LEMMONS, CFP®, CPA, AIF®, CEPA

Educational Background:

- Date of birth: February 1969
- Northern Kentucky University, BS in Business (1994)
- College for Financial Planning (2003)

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 to disclose.

Outside Business Activities: Rob serves on the board and Finance Committee of the OTR Soup Kitchen.

Supervision: Rob Lemmons is a partner and holds the position of Director of Financial Planning and Senior Advisor. He is supervised by two partners, Robert Siegmann & Dave Wilder. He supervises the work of Wealth Advisors, Joel Musser and Chris Allen.

ROBERT SIEGMANN, MBA, BFA

Educational Background:

- Date of birth: September 1976
- Xavier University, MBA (2012)
- Xavier University, BSBA in Finance (2008)
- FINRA Series 65 Investment Advisor Representative
- Behavioral Financial Advisor (2020)

Business Experience:

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

No Disciplinary Information to disclose.

Outside Business Activities: Rob owns, but outsources the monthly management on several residential rental properties.

Supervision: Rob Siegmann is a partner and holds the position of Chief Operating Officer, Chief Compliance Officer, and Wealth Advisor. He is supervised by two partners, Dave Wilder and Rob Lemmons. He supervises non-advisory support staff members, Natalie Pham, and Micah Peterson.

JONATHAN ANDRE, CFP®

Educational Background:

- Date of birth: November 1981
- Certified Financial Planner (2007)
- Xavier University, BSBA in Finance (2004)

Business Experience:

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

No Disciplinary Information to disclose.

No Other Outside Business Activities.

Supervision: Jon Andre holds the position of Portfolio Manager & Wealth Advisor and is supervised by Dave Wilder.   Jon supervises the activities of Portfolio associate, Jordan Nare.

JOEL MUSSER, CFP®

Educational Background:

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

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 to disclose.

No Other Outside Business Activities.

Supervision: Joel Musser holds the position of Wealth Advisor and is supervised by Rob Lemmons. Joel supervises the activities of Associate Wealth Advisers, Holden Varvel, Melina Young, Will Patrick and Rob Reichwein.

CHRIS ALLEN, CFP®

Educational Background:

- Date of birth: April 1989
- Ohio State Univ, BS in Financial Planning (2011)
- Series 65 Investment Advisor Rep (2016)
- Northwestern University, CFP (2018)

Business Experience:

- Total Wealth Planning, LLC (2015 to Present)
- Apprisen (2011 - 2015)

No Disciplinary Information to disclose.

No Other Outside Business Activities.

Supervision: Chris Allen holds the position of Wealth Advisor and is supervised by Rob Lemmons.

AMELIA WEST, CFP®

Educational Background:

- Date of birth: August 1979
- Purdue Univ, BS in Plant Science (2001)
- Purdue Univ, Masters of Economics (2003)
- College for Financial Planning, CFP (2012)

Business Experience:

- Total Wealth Planning, LLC (2021 to Present)
- Howell Financial Advisors (2017 to 2021)
- Goldstein Advisors (2010 to 2017)
- Ameriprise Financial (2004 to 2010)

No Disciplinary Information to disclose.

Amelia serves on two boards, the IN Education Savings Authority and The Caring Center. Neither are expected to impact her availability or objectivity.

Supervision: Amelia holds the position of Wealth Advisor and is supervised by Rob Lemmons. Amelia supervises the activities of Associate Wealth Adviser, Amy Woock.

MARC WAMBAUGH, CFP®

Educational Background:

- Date of birth: June 1973
- Ohio State Univ, Bachelor of Arts (1996)
- N. Kentucky Univ, Masters of Accounting (2008)
- College for Financial Planning, CFP (2012)

Business Experience:

- Total Wealth Planning, LLC (2021 to Present)
- Cassady Schiller Wealth Management (2006-2020)

No Disciplinary Information to disclose.

No Other Outside Business Activities.

Supervision: Marc holds the position of Wealth Advisor and is supervised jointly by Rob Lemmons and Dave Wilder.

MELINA “MEL” YOUNG, CFP®

Educational Background:

- Date of birth: September 1995
- University of Incarnate Word, Accounting and Financial Planning (2018)
- Series 65 Investment Advisor Rep (2020)
- College for Financial Planning, CFP (2022)

Business Experience:

- Total Wealth Planning, LLC (2019 to Present)
- Ridout Barrett (Tax Associate) (2018)

No Disciplinary Information to disclose.

No Other Outside Business Activities.

Supervision: Mel holds the position of Associate Wealth Advisor and is supervised by Joel Musser.

AMY WOOCK, FPQP™

Educational Background:

- Date of birth: September 1964
- Bachelor's of Science degree in Actuarial Mathematics, University of Michigan (1986)
- Financial Paraplanner Qualified Professional (FPQP™) (2016)
- Associate of the Society of Actuaries (ASA) (1992)

Business Experience:

- Total Wealth Planning, LLC (2021 to Present)
- Howell Financial Advisors (2014 to 2021)

No Disciplinary Information to disclose.

No Other Outside Business Activities.

Supervision: Amy holds the position of Financial Planner and is supervised by Amelia West.

HOLDEN VARVEL

Educational Background:

- Date of birth: December 1995
- Lee University, BSBA International Business (2018)
- Series 65 Investment Advisor Rep (2020)

Business Experience:

- Total Wealth Planning, LLC (2019 to Present)
- Apokaradokia & Penn Mutual Life Insurance Co
  - (2017 to 2019)

No Disciplinary Information to disclose.

No Other Outside Business Activities.

Supervision: Holden holds the position of Associate Wealth Advisor and is supervised by Joel Musser.

CHARLES LILES

Educational Background:
- Date of birth: May 1953
- Series 65 Investment Advisor Rep (2001)
- University of North Carolina at Greensboro, B.S. Business Administration, *Magna Cum Laude* (1977)

Business Experience:
- Total Wealth Planning, LLC (2023 to Present)
- Charles A. Liles & Assoc, President (2003-2023). CRD#2725676
- Oxford Financial Group, Assistant Director (2001-2003)
- Bank One Capital Markets, First Vice President (1980-2003)

No Disciplinary Information to disclose.

No Other Outside Business Activities.

Supervision: Charles holds the position of consultant and works closely with the firm principals and advisors.