

Form ADV Part 3: Relationship Summary

Waller Financial Planning Group, Inc.

Introduction

Waller Financial Planning Group, Inc. ("WFPG" or "we") is an investment adviser registered with the U.S. Securities and Exchange Commission. We offer our clients investment advisory services. Clients should understand that the services we provide and fees we charge are different than those of a broker-dealer, and that it is important to understand the difference between the two. Free and simple tools are available to research firms and financial professional at <https://www.investor.gov/CRS>, which also provides educational materials about investment advisers, broker-dealers and investing.

What Investment Services and Advice Can You Provide Me?

Description of Services: WFPG offers investment advisory services to retail investors. Our investment advisory services include: Asset Management Services and Financial Planning Services.

Asset Management Services: We provide asset management services which involves us managing and trading your designated account(s). We will discuss your investment goals and design a strategy to try and achieve your investment goals. We will continuously monitor your account when providing asset management services and contact you at least annually to discuss your portfolio. We offer asset management services through both wrap fee programs and non-wrap fee programs. For more information, please see [Item 4 of our Form ADV Part 2A](#). Asset management services are provided on a **discretionary** basis, meaning we will have the authority to determine the type and amount of securities that can be bought or sold for your portfolio without obtaining your consent for each transaction. For more information about investment authority, please see [Item 16 of our Form ADV Part 2A](#).

Financial Planning Services: We also provide financial planning services. Financial planning services involve us creating a written financial plan for you which covers mutually agreed upon topics.

Limited Investment Offerings: We do not primarily recommend one type of security to clients. Instead, we recommend investment portfolios designed to be suitable for each client relative to that client's specific circumstances and needs. However, we are limited in investment selection in that we can only invest your account in securities which are available on your custodian/broker-dealer's platform. When providing you services, we do not recommend or offer advice on any proprietary products.

Account & Fee Minimums: We generally require a minimum of \$500,000 in order to open an account managed by us. To reach this account minimum, you can aggregate all household accounts. The minimum annual fee generally charged for investment management and financial planning services is generally \$3,000.

Conversation Starters: *Given my financial situation, should I choose an investment advisory service? Why or why not? How will you choose investments to recommend to me? What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?*

What Fees Will I Pay?

Description of Principal Fees & Costs: Fees charged for our asset management services are charged based on a percentage of assets under management, billed in advance on a quarterly calendar basis, and calculated based on the fair market value of your account as of the last business day of the current billing period. The annual fee for asset management services will be 0.50%. Because our Asset Management Service fee is based upon the value of your account we have an incentive to recommend that you increase the level of assets in your account. We utilize wrap fee and non-wrap fee programs. Under a wrap fee program the fee you pay us covers both our advisory services and the transaction fees imposed by the broker-dealer. Under a non-wrap fee program you will be charged transaction costs separately. Since a wrap fee covers transaction expenses it tends to be higher than non-wrap fee programs. You will also be charged internal fees and expenses by the funds we invest in within your account. For more information about the fees we will charge you and expenses you may incur, please see [Item 5 of our Form ADV Part 2A: Appendix 1](#).

Financial planning services are provided under an annual fee arrangement. Your fees will be dependent on several factors including time spent with WFPG, number of meetings, complexity of your situation, amount of research, services requested and staff resources.

Any fees we charge for financial planning services will not cover the costs associated with implementing any recommendations we may make.

Additional Information: You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. For more information about the fees we charge and the other fees and expenses you will incur, please see [Item 5 of our Form ADV Part 2A](#).

Conversation Starters: *Help me understand how these fees and costs might affect my investments. If I give you an additional \$100,000 to invest, how much will go to fees and costs, and how much will be invested for me?*

What Are Your Legal Obligations to Me When Acting as My Investment Adviser? How Else Does Your Firm Make Money and What Conflicts of Interest Do You Have?

Standard of Conduct: When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you.

Here are some examples to help you understand what this means. When we provide asset management services, we will ask that you establish an account with TD Ameritrade to maintain custody of your assets and to effect trades for your account. Our recommendation to use TD Ameritrade is on reasonable due diligence to make certain that best execution is obtained for all clients when implementing any transaction by considering the back-office services, technology and pricing of services offered. In addition to the research, products and tools that help us manage and further develop our business operations. As a result, we do not have to pay for such benefits, which save us money; however, these arrangements create a conflict of interest. See [Item 12 of our Form ADV Part 2A](#) for more information about our arrangements with TD Ameritrade. We actively manage our own personal accounts while at the same time managing your accounts and other client accounts. This creates different conflicts of interest for which we have developed procedures to mitigate and control for those conflicts. For more information see [Item 11 of our Form ADV Part 2A](#).

Conversation Starters: *How might your conflicts of interest affect me, and how will you address them?*

Additional Information: For more information about our conflicts of interests and the ways we are compensated, please see [Item 5](#) and [Item 10 of our Form ADV Part 2A](#).

How Do Your Financial Professionals Make Money?

Description of Salary/Payment of Investment Adviser Representatives Our investment adviser representatives and staff are compensated by way of a salary.

Do You or Your Financial Professionals Have Legal or Disciplinary History?

Neither us, nor our investment adviser representatives have a legal or disciplinary history to report. You can look up more information about us and our investment adviser representatives at <https://www.investor.gov/CRS>.

Conversation Starters: *As a financial professional, do you have any disciplinary history? For what type of conduct?*

Additional Information About WFPG

Additional information about us and a copy of this relationship summary are available on the Internet at www.waller.com. You can also find our disclosure brochures and other information about us at <https://adviserinfo.sec.gov/firm/summary/159564>. If you have any questions or want an up-to-date copy of this relationship summary, we can be reached by phone at (614)457-7026.

Conversation Starters: *Who is my primary contact person? Is he or she a representative of an investment adviser, staff member or owner?? Who can I talk to if I have concerns about how this person is treating me?*



INVESTMENT ADVISORY SERVICES BROCHURE

January 2020

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Item 1 – COVER PAGE

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www.waller.com**

January 2020

This brochure provides information about the qualifications and business practices of Waller Financial Planning Group, Inc. If you have any questions about the contents of this Brochure, please contact us at (614) 457-7026 and/or info@waller.com. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Waller Financial Planning Group, Inc. is also available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Waller Financial Planning Group, Inc. is 159564.

Any references to Waller Financial Planning Group, Inc. as a registered investment adviser or its related persons as registered advisory representatives does not imply a certain level of skill or training.

Item 2 - MATERIAL CHANGES

At least annually, this section will discuss only specific material changes that are made to the Brochure and provide you with a summary of such changes. Additionally, reference to the date of the last annual update to this Brochure will be provided.

Since the last annual amendment to this brochure was filed in January 2019, there following change has been made to this disclosure brochure:

- In August 2019 Jason E. Farris replaced Charles A. Kerwood III as the firm's Chief Compliance Officer (CCO).

In the past, we have offered or delivered information about our qualifications and business practices to clients on at least an annual basis. Pursuant to new SEC Rules, we will ensure that you receive a summary of any material changes to this and subsequent brochures within 120 days of the close of our fiscal year, which is December 31. We may further provide other ongoing disclosure information about material changes as necessary.

Additionally, we will further provide you with a new brochure as necessary based on changes or new information, at any time, without charge.

Our brochure may be requested free of charge by contacting us at (614) 457-7026 and/or info@waller.com. Additional information about Waller Financial Planning Group, Inc. is also available via the SEC's website www.adviser.sec.gov. The website also provides information about any persons affiliated with Waller Financial Planning Group, Inc. who are registered, or are required to be registered, as investment adviser representatives of Waller Financial Planning Group, Inc.

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Item 4 - ADVISORY BUSINESS

Waller Financial Planning Group, Inc. (hereinafter referred to as “WFPG”) is an investment advisory firm offering a variety of advisory services customized to your individual needs.

- A. WFPG was founded in December 1985 by Larry Waller. In October 2011, WFPG changed ownership. WFPG is owned equally by Charles A. Kerwood, III, Shareholder, Jason A. Eliason, Shareholder, Jason E. Farris, Shareholder, and Christopher O. Olsgard, Shareholder.
- B. WFPG offers the following advisory services. Each of the services is more fully described below.
 - Investment Management
 - Financial Planning

TD AMERITRADE INSTITUTIONAL (ACAP) PROGRAM

WFPG is the sponsor of the ACAP Program, a wrap fee or non-wrap fee asset management program developed through an arrangement using TD Ameritrade Institutional platform. Through the ACAP Program, WFPG provides investment management services, including providing continuous investment advice to and making investments for you based on your individual needs. Through this service, WFPG offers a customized and individualized investment program. A specific asset allocation strategy and suitability profile is crafted to focus on your specific goals and objectives. The IPS defines your risk tolerance and investment objective. Your information should be updated regularly, but at a minimum of every 2 years.

ACAP Program accounts are custodied at TD Ameritrade Institutional in its capacity as a registered broker/dealer, member FINRA/SIPC. TD AMERITRADE INSTITUTIONAL is also an investment advisor registered with the SEC but does not serve as an investment advisor for you through the ACAP Program. TD AMERITRADE INSTITUTIONAL provides clearing, custody and other brokerage services for accounts established through the ACAP Program. Therefore, you are required to establish a brokerage account(s) through TD AMERITRADE INSTITUTIONAL’s ACAP platform. Separate accounts are maintained for you, and you retain all rights of ownership of your accounts (e. g., the right to withdraw securities or cash, exercise or delegate proxy voting, and receive transaction confirmations).

ACAP Program accounts allow you to authorize WFPG to purchase and sell, on either a discretionary basis or non-discretionary basis, portfolios consisting of securities and investments.

(See, Limits Advice to Certain Types of Investments under Item 4 - Advisory Business, relative to possible securities and investments utilized. See Item 16 - Investment Discretion, for information concerning discretionary authority.)

During any month that there is activity in the ACAP Program account, you receive a monthly account statement from TD AMERITRADE INSTITUTIONAL showing account activity as

well as positions held in the account at month end. Additionally, you receive a confirmation of each transaction that occurs within the ACAP Program account unless the transaction is the result of a systematic purchase, redemption or exchange. You also receive a detailed quarterly report showing performance, positions, and activity. All account data and statements are also available on-line through the account view portal through TD AMERITRADE INSTITUTIONAL.

- C. WFPG tailors the advisory services it offers to your individual needs. You may impose restrictions and/or limitations on the investing in certain securities or types of securities.

WFPG will gather information about you and your financial situation through meetings and completion of a fact finder or data gathering questionnaire. The information gathered by WFPG will assist WFPG to provide you with the requested services and customize the services to your financial situation. Depending on the services you have requested, WFPG will gather various financial information and history from you including, but not limited to:

- ☐ Copies of documents (e.g. wills, trusts, insurance policies)
- ☐ Retirement and financial goals
- ☐ Investment objectives
- ☐ Investment horizon
- ☐ Financial needs
- ☐ Cash flow analysis
- ☐ Cost of living needs
- ☐ Education needs
- ☐ Savings tendencies
- ☐ Other applicable financial information required by WFPG in order to provide the investment advisory services requested.

The planning process combines the development of a financial plan with a long-term investment management strategy. Beginning with your end goals in mind, this process requires you to look intensely at your financial history and present situation to align properly with your personal and professional aspirations.

The Waller Financial Planning Process is conducted in two phases: financial plan development and long-term investment management. Waller Financial provides each client with a cross-functional team with the necessary expertise to provide guidance through both phases.

- D. WFPG participates in wrap fee program.
- E. As of December 31, 2019, WFPG has \$404,665,528 of client assets under our discretionary management and \$ 43,767,229 on a nondiscretionary basis.

Investment Management Services

WFPG customizes your portfolio allocation taking into consideration your limitations or restrictions, the market and economy at the time and your financial situation, goals and objectives.

WFPG maintains an Approved Investment List. Your Advisory Representative will construct your asset allocation using securities from the approved lists.

WFPG will provide continuous and ongoing discretionary management of your account. Unless otherwise expressly requested by you, WFPG will manage the account on a discretionary basis and make changes to the allocation as deemed appropriate by WFPG. WFPG will determine the securities to be purchased and sold in the account and may alter the securities holdings from time to time, without prior consultation with you. WFPG may actively trade securities and hold such securities for periods of 30 days or less or maintain positions for longer or shorter term periods. Discretionary authority will be granted by you to WFPG by execution of the Asset Management agreement.

If you choose to have accounts managed on a nondiscretionary basis, you are advised nondiscretionary accounts are subject to certain risks. Risks may include but not be limited to the risk of missing market opportunities or the risk of the Advisory Representative not being able to move out of the market in a timely manner until client's prior authorization has been obtained before any buy, sell or exchange. Therefore, the performance of nondiscretionary accounts may fluctuate from those accounts managed on a discretionary basis. WFPG primarily uses open-ended mutual funds and uses no-load and load waived or mutual funds purchased at net asset value (NAV).

You are advised of transactions in the account. Account reallocations and rebalancing may trigger a taxable event, with the exception of IRA accounts, 403(b) accounts and other qualified retirement accounts.

Financial Planning Services

WFPG will typically provide service on matters concerning estate and retirement planning, employee benefit planning, insurance plans, securities, tax shelters, and capital accumulation methods. WFPG may also advise on income, gift and estate taxes as well as advise regarding the purchase, sale or disposition of insurance or assets other than securities or investments.

You will receive a written financial plan as well as periodic reviews for the first year (generally two to four times per year).

Plans and advice are based on your financial situation at the time and are based on financial information disclosed by you to WFPG. You are advised that certain assumptions may be made with respect to interest and inflation rates and use of past trends and performance of the market and economy. However, past performance is in no way an indication of future performance. WFPG cannot offer any guarantees or promises that your financial goals and objectives will be met. Further, you must continue to review the plan and update the plan based upon changes in your financial situation, goals, or objectives or changes in the economy. Should your financial situation or investment goals or objectives change, you must notify WFPG promptly of the changes. You are advised that the advice offered by WFPG may be limited and is not meant to be comprehensive. Therefore, you may need to seek the services of other professionals such as an insurance adviser, attorney and/or accountant.

General Information

You are advised the investment recommendations and advice offered by WFPG are not legal advice or accounting advice. You should coordinate and discuss the impact of financial advice with your attorney and/or accountant. You are advised that it is necessary to inform WFPG promptly with respect to any changes in your financial situation and investment goals and objectives. Failure to notify WFPG of any such changes could result in investment recommendations not meeting your needs.

Item 5 - FEES AND COMPENSATION

Investment Management Services

- A. Fees are negotiable and are not based on a share of capital gains or capital appreciation of the funds or any portion of the funds.

No fee adjustments will be made for Account appreciation or depreciation. Further, no fee adjustments will be made for additional deposits to the account or partial withdrawals from the account during a billing period.

ACAP Program

For our asset management services, clients will be charged an annual flat fee of 0.50% of their assets under management.

WFPG may change the above fee schedule upon 30-days prior written notice to you.

Fees are negotiable at the discretion of WFPG. The annual fee is divided and paid quarterly in advance through a direct debit to your account. TD AMERITRADE INSTITUTIONAL is responsible for debiting all fees from your accounts. You must provide TD AMERITRADE INSTITUTIONAL with written authorization to debit advisory fees from your accounts and pay the fees to WFPG. Fees are based on the account's asset value as of the last business day of the calendar quarter. Fees for accounts opened at any time other than the beginning of a quarter are prorated based on the number of days remaining in the initial quarter.

Prior to engaging WFPG to provide investment management services, you are required to enter into a formal investment advisory agreement setting forth the terms and conditions, including the

amount of investment advisory fees, under which WFPG manages your assets and also a separate custodial/clearing agreement with TD AMERITRADE INSTITUTIONAL.

You can open an ACAO Program or ACAP Program account. An ACAO Program account is a non-wrap or traditional account. This means in addition to the investment advisory fee, you may also pay certain transaction charges to defray the costs associated with trade execution. These costs are set out in the TD AMERITRADE INSTITUTIONAL brokerage account and application agreement. The ACAP Program account is a wrap fee account, meaning you do not pay transaction charges associated with trade execution.

You may incur certain charges imposed by third parties other than WFPG in connection with investments made through the account including, surrender charges, and IRA and qualified retirement plan fees. Management fees (which include transaction and execution fees charged by TD AMERITRADE INSTITUTIONAL for ACAP Program accounts) are separate and distinct from the fees and expenses charged by investment company securities that may be recommended to you. A description of these fees and expenses are available in each investment company security's prospectus.

The ACAO Program and ACAP Program may cost you more or less than if the assets were held in a traditional brokerage account. In a brokerage account, you are charged commissions for each transaction, and the representative has no duty to provide ongoing advice with respect to the account. If you plan to follow a buy and hold investment strategy for the account or do not wish to purchase ongoing investment advice or management services, you should consider opening a brokerage account rather than an ACAO Program or ACAP Program account.

Either party may terminate the agreement for services at any time. If services are terminated within five business days of executing the agreement, services are terminated without penalty and a full refund of all fees paid in advance is provided. If services are terminated after the initial five-day period, we provide you with a prorated refund of fees paid in advance. The refund is based on the number of days service is actually provided during the final billing period. Termination is effective from the time the other party receives written notification or such other time as may be mutually agreed upon, subject to the settlement of transactions in progress and the final refund of advisory fees. There is no penalty charge on termination.

This section is intended to be a summary of the TD Ameritrade Institutional Program. If you contract for TD Ameritrade Institutional Program services you are provided with a copy of the TD Ameritrade Institutional Program Form ADV Part 2A Appendix 1 Wrap Fee Program brochure.

The minimum fee for investment management is \$3,000.

Your Investment Management Fee will be adjusted either annually or quarterly as agreed upon between you and your Advisory Representative. Details of the frequency of your fee adjustment will be outlined in your advisory agreement with WFPG. A client's fee is typically based on the value of all assets within the household under management. However, under certain circumstances not all assets will be charged a fee based on the household value. Such circumstances include clients who keep assets separate, accounts that came under management at different times and multiple family assets.

- B. Advisory fees will generally be collected directly from your account, provided you have given

WFPG written authorization. You will be provided with an account statement reflecting the deduction of the advisory fee direct from the account custodian. If the Account does not contain sufficient funds to pay advisory fees, WFPG has limited authority to sell or redeem securities in sufficient amounts to pay advisory fees. You may reimburse the account for advisory fees paid to WFPG, except for ERISA and IRA accounts.

- C. The above fee includes WFPG's advisory fee. WFPG will pay any transaction charges as a result of transactions conducted in the client's account. Several funds are available at no transaction fees. Consequently, there is an incentive for WFPG to utilize funds with no transaction fees in an effort to reduce WFPG's costs. Further, certain funds have short term trading fees assessed in the event the fund is purchased and sold in a short-term period (typically 60 to 90 days but differs by fund). WFPG will offset or reduce its advisory fee by any short-term trading fees that may be assessed to the client. In addition to the advisory fees above, you may pay fees for custodial services, account maintenance fees, and other fees associated with maintaining the Account. Such fees are not charged by WFPG but rather by the product, broker/dealer or account custodian. WFPG does not share in any portion of such fees. Additionally, you may pay your proportionate share of the fund's management and administrative fees as well as the mutual fund adviser's fee of any mutual fund purchased. Such advisory fees are not shared with WFPG and are compensation to the fund-manager.
- D. Advisory fees will be charged in advance of a quarterly billing period (every three months). The quarterly advisory fee will be based on the value of the Account on the last business day of the just completed quarterly billing period. Fees for partial period will be prorated. The initial quarterly fee will be a pro-rated portion of the fee based on the number of days remaining in quarterly billing period. The initial fee will be calculated based upon the value of the account upon establishment.

Termination Provisions

You may terminate investment advisory services obtained from WFPG, without penalty, upon written notice within five (5) business days after entering into the advisory agreement with WFPG. Thereafter, you may terminate investment advisory services with 30 days written notice to WFPG. Under both scenarios, you will be responsible for any fees and charges incurred from third parties as a result of maintaining the Account such as account maintenance, custodial, or termination fees. The refund of investment advisory services fees will be pro-rated from the date of termination to the end of the quarterly billing period.

- E. Transaction fees charged by the qualified custodian are billed directly to you by the qualified custodian. WFPG does not receive any portion of such fees from you or the qualified custodian. Please refer to *Item 12 Brokerage Practices* for more information. In addition, you may incur certain charges imposed by third parties other than WFPG in connection with investments made through your account including, but not limited to, IRA and qualified retirement plan fees, and charges imposed by the qualified custodian(s) of your account. Management fees charged by WFPG are separate and distinct from the fees and expenses charged by investment company securities that may be recommended to you.

Financial Planning Services

You are advised that fees for planning services are strictly for planning services. Therefore, you may pay fees and/or commissions for additional services obtained such as asset management or products purchased such as securities or insurance.

Fees are negotiable. Your fees will be dependent on several factors including time spent with WFPG, number of meetings, complexity of your situation, amount of research, services requested and staff resources.

The minimum hourly rate for financial planning advice is \$250.

The Financial Planning Fee Component charged will be at the discretion of WFPG and will be based upon the time spent with WFPG, number of meetings, complexity of your situation, amount of research, services requested and staff resources.

Termination Provisions

You may terminate advisory services obtained from WFPG, without penalty, upon written notice within five (5) business days after entering into the advisory agreement with WFPG. Thereafter, you may terminate financial planning services with 30 days written notice to WFPG. You will be responsible for any time spent by WFPG.

Item 6 - PERFORMANCE-BASED FEES AND SIDE BY SIDE MANAGEMENT

This section is not applicable to WFPG since WFPG does not charge performance-based fees.

Item 7 - TYPES OF CLIENTS

WFPG's services are geared toward: individuals both high net worth (i.e. clients with a net worth of \$1,500,000) and other than high net worth, as well as pension and profit sharing plans and charitable organizations.

WFPG requires minimum fees for financial planning and investment management services. You are advised the minimum fees in relation to your account size may be deemed excessive. You may obtain similar services from another investment adviser at a lower cost.

Financial Planning Minimum Fee	\$3,000
Investment Management Minimum Fee	\$3,000

WFPG generally requires a minimum amount of assets be deposited to an account for the purpose of obtaining Investment Management Services. WFPG will generally require you to deposit a minimum of \$500,000 (cash or securities). However, under certain circumstances, WFPG may waive the

minimum account size requirement and accept accounts less than \$500,000. Such circumstances may include but not be limited to additional assets will soon be deposited or you have other accounts under management with WFPG. You are advised performance may suffer due to difficulties with diversifying smaller accounts and due to risk controls potentially being compromised.

Item 8 - METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

- A. WFPG conducts economic analysis and attempts to analyze and determine the trends. Additionally, WFPG uses data from various sources, on a subscription basis, such as Morningstar for mutual fund screening on a quarterly basis. These sources may use fundamental and technical analysis in their research. Fundamental analysis generally involves assessing a company's or security's value based on factors such as sales, assets, markets, management, products and services, earnings, and financial structure. Technical analysis generally involves studying trends and movements in a security's price, trading volume, and other market-related factors in an attempt to discern patterns.
- B. You are advised investing in securities involves risk of loss, including the potential loss of principal. Therefore, your participation in any of the management programs offered by WFPG will require you to be prepared to bear the risk of loss and fluctuating performance.

WFPG does not represent, warrant or imply that the services or methods of analysis used by WFPG can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to major market corrections. Past performance is no indication of future performance. No guarantees can be offered that your goals or objectives will be achieved. Further, no promises or assumptions can be made that the advisory services offered by WFPG will provide a better return than other investment strategies.

- C. WFPG uses exchange traded funds and mutual funds. When investing in an ETF or mutual fund, you will bear additional expenses based on your pro rata share of the ETF's or mutual fund's operating expenses, including the potential duplication of management fees. The risks with exchange traded funds and mutual funds include:
- **Manager Risk:** The risk that an actively managed mutual fund's investment adviser will fail to execute the fund's stated investment strategy.
 - **Market Risk:** The risk that the Stock Market will decline, decreasing the value of the securities contained within the mutual funds we recommend to you.
 - **Industry Risk:** The risk that a group of stocks in a single industry will decline in price due to adverse developments in that industry, decreasing the value of mutual funds that are significantly invested in that industry.
 - **Inflation Risk:** The risk that the rate of price increases in the economy deteriorates the returns associated with the mutual fund.

These are some of the primary risks associated with investments. Please do not hesitate to contact us to discuss these risks and others in more detail. Mutual fund fees are described in the

fund's prospectus, which the custodian mails directly to the client following any purchase of a mutual fund that is new to the client's account. In addition, a prospectus is available online at each mutual fund company's Web site. At the client's request at any time WFPG will direct the client to the appropriate Web page to access the prospectus.

Item 9 - DISCIPLINARY INFORMATION

Neither WFPG nor its management has ever been subject to any disciplinary action.

Item 10 - OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

WFPG is not and does not have a related person who is a: futures commission merchant, commodity pool operator, commodity trading advisor, or an associated person of the foregoing entities. Further, WFPG is not and does not have a related person who is: broker/dealer or other similar type of broker or dealer; investment company or other pooled investment vehicle, other investment adviser or financial planner; futures commission merchant or commodity pool operator; banking or thrift institution; accountant or accounting firm; lawyer or law firm; pension consultant; real estate broker or dealer; insurance company or agency or sponsor or syndicator of a limited partnership.

WFPG attempts to mitigate the conflicts of interest with the potential receipt of commissions if recommendations are implemented by providing you with these disclosures. Further, you are encouraged to consult other professionals and may implement recommendations through other financial professionals.

Item 11 - CODE OF ETHICS, PARTICIPATION OF INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

Code of Ethics

- A. WFPG has a fiduciary duty to you to act in your best interest and always place your interests first and foremost. WFPG takes seriously its compliance and regulatory obligations and requires all staff to comply with such rules and regulations as well as WFPG's policies and procedures. Further, WFPG strives to handle your non-public information in such a way to protect information from falling into hands that have no business reason to know such information and provides you with WFPG's Privacy Policy. As such, WFPG maintains a code of ethics for its Advisory Representatives, supervised persons and staff. The Code of Ethics contains provisions for standards of business conduct in order to comply with federal securities laws, personal securities reporting requirements, pre-approval procedures for certain transactions, code violations reporting requirements, and safeguarding of material non-public information about your transactions. Further, WFPG's Code of Ethics establishes WFPG's expectation for business conduct. A copy of our Code of Ethics will be provided to you upon request.
- B. Neither WFPG nor its associated persons recommend to clients or buys or sells for client accounts any securities in which we have a material financial interest.

- C. WFPG and its associated persons may buy or sell securities identical to those securities recommended to you. Therefore, WFPG and/or its associated persons may have an interest or position in certain securities that are also recommended and bought or sold to you. WFPG and its associated persons will not put their interests before your interest. WFPG and its associated persons may not trade ahead of you or trade in such a way to obtain a better price for themselves than for you or other clients.
- D. WFPG is required to maintain a list of all securities holdings for its associated persons and develop procedures to supervise the trading activities of associated persons who have knowledge of your transactions and their related family accounts at least quarterly. Further, associated persons are prohibited from trading on non-public information or sharing such information.

Prohibition on Use of Insider Information

WFPG has adopted policies and procedures to prevent the misuse of “insider” information (i.e. material, non-public information). A copy of such policies and procedures is available to any person upon request.

Item 12 - BROKERAGE PRACTICES

Clients are under no obligation to act on the financial planning recommendations of WFPG. If the firm assists in the implementation of any recommendations, we are responsible to ensure that the client receives the best execution possible. Best execution does not necessarily mean that clients receive the lowest possible costs but that the qualitative execution is best. In other words, all conditions considered, the transaction execution is in your best interest. When considering best execution, we look at a number of factors besides prices and rates including, but not limited to:

- Execution capabilities (e.g., market expertise, ease/reliability/timeliness of execution, responsiveness, integration with our existing systems, ease of monitoring investments)
- Products and services offered (e.g., investment programs, back office services, technology, regulatory compliance assistance, research and analytic services)
- Financial strength, stability and responsibility
- Reputation and integrity
- Ability to maintain confidentiality

We exercise reasonable due diligence to make certain that best execution is obtained for all clients when implementing any transaction by considering the back-office services, technology and pricing of services offered.

Brokerage Recommendations

You are under no obligation to act on the financial planning recommendations of WFPG. If we assist you in the implementation of any recommendations, we are responsible to ensure that you receive the best execution possible.

WFPG recommends that you establish brokerage accounts with TD Ameritrade through their Institutional Platform. TD Ameritrade, Inc. (“TD Ameritrade”) is a member of FINRA/SIPC/NFA. TD Ameritrade is

an independent (and unaffiliated) SEC-registered broker-dealer and is recommended by WFPG to maintain custody of clients' assets and to effect trades for their accounts.

At least annually, we will review alternative custodians in the marketplace for comparison to the currently used custodian, evaluating criteria such as overall expertise, cost competitiveness, and financial condition. Quality of execution for custodians will be reviewed through trade journal evaluations.

WFPG is independently owned and operated and not affiliated with TD Ameritrade.

The primary factor in suggesting a broker/dealer or custodian is that the services of the recommended firm are provided in a cost-effective manner. While quality of execution at the best price is an important determinant, best execution does not necessarily mean lowest price and it is not the sole consideration. The trading process of any broker/dealer and money manager suggested by WFPG must be efficient, seamless, and straight-forward. Overall custodial support services, trade correction services, and statement preparation are some of the other factors determined when suggesting a broker/dealer.

TD Ameritrade, Inc. provides us with access to their institutional trading and custody services, which are typically not available to retail investors. These services generally are available to independent investment advisors at no charge to them so long as the independent investment advisors maintain a minimum amount of assets with the custodian.

TD Ameritrade does not charge separately for custody but is compensated by account holders through commissions or other transaction-related fees for securities trades that are executed by recommended money managers through the custodian or that settle into a custodian account.

These benefits include, but are not necessarily limited to: receipt of duplicate client confirmations and bundled duplicate statements; access to a trading desk; access to block trading which provides the ability to aggregate securities transactions and allocate the appropriate shares to client accounts; the ability to have investment advisory fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; and access to mutual funds that generally require significantly higher minimum initial investments or are generally only available to institutional investors.

TD Ameritrade, Inc. also makes available to us other products and services that benefit our firm but may not benefit clients' accounts. Some of these other products and services assist us in managing and administering clients' accounts. These include software and other technology that provide access to client account data (such as trade confirmation and account statements); provide research, pricing information and other market data; facilitate payment of the firm's fees from its clients' accounts; and assist with back-office functions; record keeping and client reporting. Many of these services generally may be used to service all or a substantial number of our accounts, including accounts not maintained at a recommended custodian. WFPG is also providing other services intended to help our firm manage and further develop our business enterprise. These services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance and marketing.

Specifically, WFPG participates in the TD Ameritrade Institutional program. TD Ameritrade Institutional is a division of TD Ameritrade, Inc. TD Ameritrade offers to independent investment Advisors services which include custody of securities, trade execution, clearance and settlement of transactions. Adviser receives some benefits from TD Ameritrade through its participation in the program. *(Please see the disclosure under Item 14 below.)*

Directed Brokerage

Clients may be allowed to select the broker/dealer that will be used for their accounts. Clients directing the use of a particular broker/dealer or other custodian must understand that we may not be able to obtain the best prices and execution for the transaction. Under a client-directed brokerage arrangement, clients may receive less favorable prices than would otherwise be the case if the client had not designated a particular broker/dealer or custodian. Directed brokerage account trades are generally placed by WFPG after effecting trades for other clients of WFPG. In the event that a client directs WFPG to use a particular broker or dealer, WFPG may not be authorized to negotiate commissions and may be unable to obtain volume discounts or best execution. In addition, under these circumstances a disparity in commission charges may exist between the commissions charged to clients who direct WFPG to use a particular broker or dealer versus clients who do not direct the use of a particular broker or dealer.

Soft Dollar Benefits

An investment adviser receives soft dollar benefits from a broker-dealer when the investment adviser receives research or other products and services in exchange for client securities transactions or maintaining an account balance with the broker-dealer.

WFPG utilizes the services of TD Ameritrade. While there is no direct linkage (except in certain circumstances) between the investment advice given to clients and WFPG's participation in the TD Ameritrade program, economic benefits are received by WFPG which would not be received if we did not give investment advice to clients.

The benefits received through participation in the TD Ameritrade program do not depend upon the amount of transactions directed to or amount of assets managed through TD Ameritrade.

Research obtained with soft dollars is not necessarily utilized for the specific account that generated the soft dollars. We do not attempt to allocate the relative costs or benefits of research among clients because we believe that, in the aggregate, the research we receive benefits all clients and assists us in fulfilling our overall duty to you.

These arrangements create a conflict of interest to the extent that we would have to pay for some or all of the research and/or services with "hard dollars" if we were unable to obtain the research and services in exchange for commissions in connection with client transactions. Client trades are always implemented based on the goals and objectives of the client and not on any research, products or other incentives available.

Handling Trade Errors

WFPG has implemented procedures designed to prevent trade errors; however, trade errors in client accounts cannot always be avoided. Consistent with its fiduciary duty, it is the policy of WFPG to correct trade errors in a manner that is in the best interest of the client. In cases where the client causes the trade error, the client is responsible for any loss resulting from the correction. Depending on the specific circumstances of the trade error, the client may not be able to receive any gains generated as a result of the error correction. In all situations where the client does not cause the trade error, the client is made whole and any loss resulting from the trade error is absorbed by WFPG if the error is caused by WFPG. If the error is caused by the broker/dealer, the broker/dealer is responsible for handling the trade error. If an investment gain results from the correcting trade, the gain remains in the client's account unless the same error involved other client account(s) that should also receive the gains. It is not permissible for all clients

to retain the gain. WFPG may also confer with a client to determine if the client should forego the gain (e.g., due to tax reasons).

WFPG will never benefit or profit from trade errors.

Block Trading Policy

We may elect to purchase or sell the same securities for several clients at approximately the same time. This process is referred to as aggregating orders, batch trading or block trading and is used by our firm when WFPG believes such action may prove advantageous to clients. If and when we aggregate client orders, allocating securities among client accounts is done on a fair and equitable basis. Typically, the process of aggregating client orders is done in order to achieve better execution, to negotiate more favorable commission rates or to allocate orders among clients on a more equitable basis in order to avoid differences in prices and transaction fees or other transaction costs that might be obtained when orders are placed independently.

WFPG uses the pro rata allocation method for transaction allocation.

Under this procedure, pro rata trade allocation means an allocation of the trade at issue among applicable advisory clients in amounts that are proportional to the participating advisory client's intended investable assets. WFPG will calculate the pro rata share of each transaction included in a block order and assigns the appropriate number of shares of each allocated transaction executed for the client's account.

If and when we determine to aggregate client orders for the purchase or sale of securities, including securities in which WFPG or our associated persons may invest, we will do so in accordance with the parameters set forth in the SEC No-Action Letter, *SMC Capital, Inc.* Neither we nor our associated persons receive any additional compensation as a result of block trades.

Agency Cross Transactions

Our associated persons are prohibited from engaging in agency cross transactions, meaning we cannot act as brokers for both the sale and purchase of a single security between two different clients and cannot receive compensation in the form of an agency cross commission or principal mark-up for the trades.

Item 13 - REVIEW OF ACCOUNTS

- A. If you are participating in the Investment Management Services you will be invited to participate in at least an annual review. The frequency of reviews will be determined and agreed to between you and your Advisory Representative. Your Advisory Representative will monitor for changes or shifts in the economy, changes to the management and structure of a mutual fund or company in which your assets are invested, and market shifts and corrections.

If you are participating in Financial Planning Services you will receive regular plan reviews (generally one to four times per year). Other than the initial plan or analysis, there will be no other reports issued.

The following individuals participate in the review of clients' accounts:

- Charles A. Kerwood, III, Shareholder, Advisory Representative

- Jason A. Eliason, Shareholder, Advisory Representative
 - Jason E. Farris, Shareholder, Advisory Representative
 - Christopher O. Olsgard, Shareholder, Advisory Representative
 - Scott E. Rendle, Advisory Representative
 - Katherine E. Kincaid, Advisory Representative
- B. You are advised that you must notify your Advisory Representative promptly of any changes to your financial goals, objectives or financial situation as such changes may require him/her to review the portfolio allocation and make recommendations for changes.
- C. You will be provided statements at least quarterly directly from the account custodian. Additionally, you will receive confirmations of all transactions occurring directly from the account custodian.

Item 14 - CLIENT REFERRALS AND OTHER COMPENSATION

- A. Product vendors recommended by WFPG may provide monetary and non-monetary assistance with client events, provide educational tools and resources. WFPG does not select products as a result of any monetary or non-monetary assistance. The selection of client appropriate product is first and foremost. WFPG's due diligence of a product does not take into consideration any assistance it may receive. Therefore, this is not considered a conflict of interest but a benefit for you and WFPG.
- B. WFPG does not compensate any persons for referrals.

Item 15 - CUSTODY

Custody, as it applies to investment advisors, has been defined by regulators as having access or control over client funds and/or securities. In other words, custody is not limited to physically holding client funds and securities. If an investment adviser has the ability to access or control client funds or securities, the investment adviser is deemed to have custody and must ensure proper procedures are implemented.

WFPG is deemed to have custody of client funds and securities whenever we are given the authority to have fees deducted directly from client accounts. For a select number of client accounts (401(k) plans, 403(b) and 457 plans, retirement plans, and self-directed brokerage accounts), we can log in to a client's accounts using the client's unique log-in information on a web site. When accessing the account through the client's log-in access, our authorizations are broader than customary, and we are deemed to have custody beyond the ability to deduct fees from the account.

For accounts in which WFPG is deemed to have custody, we have established procedures to ensure all client funds and securities are held at a qualified custodian in a separate account for each client under that client's name. Clients or an independent representative of the client will direct, in writing, the establishment of all accounts and therefore are aware of the qualified custodian's name, address and the manner in which the funds or securities are maintained. Finally, account statements are delivered

directly from the qualified custodian to each client, or the client's independent representative, at least quarterly. **Clients should carefully review those statements and are urged to compare the statements against any reports received directly from WFPG.** When clients have questions about their account statements, they should contact WFPG or the qualified custodian preparing the statement.

Specific to accounts for which we have custody beyond the ability to deduct advisory fees, we have engaged an independent public accounting firm not affiliated in any way with WFPG to perform an annual surprise verification examination. The purpose of such an examination is to verify that the funds and securities held in accounts actually exist and are located at the applicable qualified custodian.

Item 16 - INVESTMENT DISCRETION

You may grant WFPG authorization to manage your account on a discretionary basis. Discretionary authority will give WFPG the authority to buy, sell, exchange and convert securities in your managed accounts. You will grant such authority to WFPG by execution of the advisory agreement. You may terminate discretionary authorization at any time upon receipt of written notice by WFPG.

Additionally, you are advised that:

- 1) You may set parameters with respect to when the account should be rebalanced and set trading restrictions or limitations;
- 2) Your written consent is required to establish any mutual fund, variable annuity, or brokerage account;
- 3) With the exception of deduction of WFPG's advisory fees from the account, if you have authorized automatic deductions, WFPG will not have the ability to withdraw your funds or securities from the account.

Item 17 - VOTING CLIENT SECURITIES

WFPG does not vote your securities. Unless you suppress proxies, securities proxies will be sent directly to you by the account custodian or transfer agent. You may contact WFPG about questions and our opinions on how to vote proxies. However, the voting and how you vote the proxies is solely your decision.

Item 18 - FINANCIAL INFORMATION

- A. WFPG will not require you to prepay more than six or more months in advance of receiving the advisory service.
- B. As stated above, WFPG has discretionary authority over client accounts; however that authority does not extend to the withdrawal of any client assets, with the exception of deduction of WFPG's advisory fees from your accounts. We are financially stable. There is no financial condition that is likely to impair our ability to meet our contractual commitment to you or any other client.
- C. Neither WFPG nor any of its Advisory Representatives has ever been the subject of a bankruptcy petition.

BROCHURE SUPPLEMENTS

Item 1

**Charles A. Kerwood, III, CFP[®], ChFC[®] AEP[®]
801 Laurel Oak Drive
Suite 710
Naples, FL 34108
P: 239-325-8505**

**Waller Financial Planning Group, Inc.
941 Chatham Lane, Suite 212
Columbus, OH 43221
P: 614-457-7026**

September 2020

This brochure supplement provides information about Charles A. Kerwood, III that supplements the Waller Financial Planning Group, Inc. brochure. You should have received a copy of that brochure. Please contact us at the number referenced above if you did not receive Waller Financial Planning Group, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Charles A. Kerwood, III is available on the SEC's website at www.adviserinfo.sec.gov.

Charles A. Kerwood, III, CFP[®], ChFC[®]

Item 2 - Educational Background and Business Experience

Year of Birth: 1969

Education:

Name of School	Year Graduated	Degree	Major
Ohio State University	1992	B.S.	International Business, Economics & Finance

Business Background:

Name of Employer	Type of Business	Title	Period of Employment
Waller Financial Planning Group, Inc.	Investment Adviser	Shareholder, Advisory Representative	06/1990 to Present
LPL, LLC	Broker/Dealer	Registered Representative	11/2008 to 11/2013
Royal Alliance Associates, Inc.	Broker/Dealer	Registered Representative	10/1997 to 11/2008

Charles has attained the following professional designations:

The CERTIFIED FINANCIAL PLANNER[™], CFP[®] and federally registered CFP (with flame design) marks (collectively, the “CFP[®] marks”) are professional certification marks granted in the United States by the Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP[®] certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP[®] certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP[®] certification in the United States.

To attain the right to use the CFP[®] marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). The CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP[®] Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios

designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;

- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

ChFC® (Chartered Financial Consultant®): The ChFC® designation has been a mark of excellence for almost thirty years and currently requires nine college-level courses, the most of any financial planning credential. Average study time to earn the ChFC® exceeds 450 hours. Required courses cover extensive education and application training in financial planning, income taxation, investments, and estate and retirement planning. Additional electives are chosen from such topics as macroeconomics, financial decisions for retirement, and executive compensation. ChFC® designees must meet experience requirements and adhere to continuing education and ethical standards. The credential is awarded by The American College, a non-profit educator with an 83-year heritage and the highest level of academic accreditation.

AEP® (Accredited Estate Planner® Designation): Professional estate planners can obtain an accreditation that acknowledges their experience and specialization in estate planning. Simply put, the Accredited Estate Planner® designation means "I believe in the team concept of estate planning."

Awarded by the National Association of Estate Planners & Councils to recognized estate planning professionals who meet special requirements of education, experience, knowledge, professional reputation, and character, the AEP® designation helps both clients and colleagues understand your belief in, and dedication to, the team concept of estate planning.

The Accredited Estate Planner® designation is available to attorneys, Chartered Life Underwriters®, Certified Public Accountants, Certified Trust and Financial Advisors, Chartered Financial Consultants®,

and Certified Financial Planners® who are actively engaged in estate planning and meet stringent qualifications at the time of application and commit to ongoing continuing education and recertification requirements.

- With a minimum of 5 years of experience, the designation is available after taking two courses through The American College. For information about courses offered through The American College, please click [HERE](#).
- For those individuals who have 15 years of experience or more, one may choose to be exempt from the required graduate-level courses in estate planning.

Item 3 - Disciplinary Information

Charles A. Kerwood, III is not subject to legal or disciplinary events that are material to a client or prospective client's evaluation of him or the services offered by him.

Item 4 - Other Business Activities

Charles is not actively engaged in any other investment-related business or occupation. Further, he is not actively engaged in any other business or occupation for compensation. "Actively engaged" is deemed to mean the business activity represents more than 10 percent of his time and income.

Item 5 - Additional Compensation

Charles A. Kerwood, III does not receive any economic benefit (i.e. sales awards and other prizes) for providing advisory services from a non-client.

Item 6 - Supervision

Supervision and oversight of the activities conducted through WFPG is conducted by Jason E. Farris, Chief Compliance Officer of WFPG. Jason E. Farris can be contacted at 614-457-7026. Jason E. Farris III participates in investment committee meetings and has access to review managed accounts. Additionally, all account information required to establish an account for a client must flow through Jason E. Farris. Jason E. Farris has procedures in place to be aware of any outside business activities engaged in by WFPG advisors, oversee communications with the public, and review personal trading activities of WFPG advisors as well as in any account over which the advisors have direct or indirect beneficial interest. Furthermore, Jason has implemented a written code of ethics and policies procedures. All supervised persons are required to acknowledge their agreement to comply with the code of ethics and written policies and procedures.

Item 1
BROCHURE SUPPLEMENT

Christopher O. Olsgard, CFP®

Waller Financial Planning Group, Inc.
941 Chatham Lane, Suite 212
Columbus, OH 43221
P: 614-457-7026

September 2020

This brochure supplement provides information about Christopher O. Olsgard that supplements the Waller Financial Planning Group, Inc. brochure. You should have received a copy of that brochure. Please contact us at the number referenced above if you did not receive Waller Financial Planning Group, Inc.'s brochure or if you have any questions about the contents of this supplement.

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

Christopher O. Olsgard, CFP®

Item 2 - Educational Background and Business Experience

Year of Birth: 1980

Education:

Name of School	Year Graduated	Degree	Major
Ohio State University	2004	B.S.	Finance and Real Estate/Urban Analysis

Business Background:

Name of Employer	Type of Business	Title	Period of Employment
Waller Financial Planning Group, Inc.	Investment Adviser	Advisory Representative, Shareholder	11/2004 to Present
LPL, LLC	Broker/Dealer	Registered Representative	11/2008 to 11/2013
Royal Alliance Associates, Inc.	Broker/Dealer	Registered Representative	11/2004 to 11/2008

Christopher has attained the following professional designation:

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by the Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). The CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios

designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;

- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Item 3 - Disciplinary Information

Christopher O. Olsgard is not subject to legal or disciplinary events that are material to a client or prospective client's evaluation of him or the services offered by him.

Item 4 - Other Business Activities

Christopher is not actively engaged in any other investment-related business or occupation. Further, he is not actively engaged in any other business or occupation for compensation. "Actively engaged" is deemed to mean the business activity represents more than 10 percent of his time and income.

Item 5 - Additional Compensation

Christopher O. Olsgard does not receive any economic benefit (i.e. sales awards and other prizes) for providing advisory services from a non-client.

Item 6 - Supervision

Supervision and oversight of the activities conducted through WFPG is conducted by Jason E. Farris, Chief Compliance Officer of WFPG. Jason E. Farris can be contacted at 614-457-7026. Jason E. Farris III participates in investment committee meetings and has access to review managed accounts. Additionally, all account information required to establish an account for a client must flow through Jason E. Farris. Jason E. Farris has procedures in place to be aware of any outside business activities engaged in by WFPG advisors, oversee communications with the public, and review personal trading activities of WFPG advisors as well as in any account over which the advisors have direct or indirect beneficial interest. Furthermore, Jason has implemented a written code of ethics and policies procedures. All supervised persons are required to acknowledge their agreement to comply with the code of ethics and written policies and procedures.

BROCHURE SUPPLEMENT

Jason A. Eliason, CFP[®], ChFC[®], CFA[®]
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September 2020

This brochure supplement provides information about Jason A. Eliason that supplements the Waller Financial Planning Group, Inc. brochure. You should have received a copy of that brochure. Please contact us at the number referenced above if you did not receive Waller Financial Planning Group, Inc.'s brochure or if you have any questions about the contents of this supplement.

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

Jason A. Eliason, CFP®

Item 2 - Educational Background and Business Experience

Year of Birth: 1977

Education:

Name of School	Year Graduated	Degree	Major
Ohio Wesleyan University	1999	B.A.	Economics Management

Business Background:

Name of Employer	Type of Business	Title	Period of Employment
Waller Financial Planning Group, Inc.	Investment Adviser	Shareholder, Advisory Representative	01/1999 to Present
LPL, LLC	Broker/Dealer	Registered Representative	11/2008 to 11/2013
Royal Alliance Associates, Inc.	Broker/Dealer	Registered Representative	07/1999 to 11/2008

Jason has attained the following professional designations:

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by the Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). The CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination,

administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;

- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

ChFC® (Chartered Financial Consultant®): The ChFC® designation has been a mark of excellence for almost thirty years and currently requires nine college-level courses, the most of any financial planning credential. Average study time to earn the ChFC® exceeds 450 hours. Required courses cover extensive education and application training in financial planning, income taxation, investments, and estate and retirement planning. Additional electives are chosen from such topics as macroeconomics, financial decisions for retirement, and executive compensation. ChFC® designees must meet experience requirements and adhere to continuing education and ethical standards. The credential is awarded by The American College, a non-profit educator with an 83-year heritage and the highest level of academic accreditation.

Chartered Financial Analyst (CFA): The Chartered Financial Analyst (CFA) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute — the largest global association of investment professionals.

There are currently more than 90,000 CFA charterholders working in 134 countries. To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of

Professional Conduct.

High Ethical Standards

The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA charterholders to:

- Place their clients' interests ahead of their own
- Maintain independence and objectivity
- Act with integrity
- Maintain and improve their professional competence
- Disclose conflicts of interest and legal matters

Global Recognition

Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA charterholders—often making the charter a prerequisite for employment.

Additionally, regulatory bodies in 22 countries and territories recognize the CFA charter as a proxy for meeting certain licensing requirements, and more than 125 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

Comprehensive and Current Knowledge

The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

To learn more about the CFA charter, visit www.cfainstitute.org.

Item 3 - Disciplinary Information

Jason A. Eliason is not subject to legal or disciplinary events that are material to a client or prospective client's evaluation of him or the services offered by him.

Item 4 - Other Business Activities

Jason is not actively engaged in any other investment-related business or occupation. Further, he is not actively engaged in any other business or occupation for compensation. "Actively engaged" is deemed to mean the business activity represents more than 10 percent of his time and income.

Item 5 - Additional Compensation

Jason A. Eliason does not receive any economic benefit (i.e. sales awards and other prizes) for providing advisory services from a non-client.

Item 6 - Supervision

Supervision and oversight of the activities conducted through WFPG is conducted by Jason E. Farris, Chief Compliance Officer of WFPG. Jason E. Farris can be contacted at 614-457-7026. Jason E. Farris III participates in investment committee meetings and has access to review managed accounts. Additionally, all account information required to establish an account for a client must flow through Jason E. Farris. Jason E. Farris has procedures in place to be aware of any outside business activities engaged in by WFPG advisors, oversee communications with the public, and review personal trading activities of WFPG advisors as well as in any account over which the advisors have direct or indirect beneficial interest. Furthermore, Jason has implemented a written code of ethics and policies procedures. All supervised persons are required to acknowledge their agreement to comply with the code of ethics and written policies and procedures.

Item 1

BROCHURE SUPPLEMENT

Jason E. Farris, CFP[®] CAP[®]

**Waller Financial Planning Group, Inc.
941 Chatham Lane, Suite 212
Columbus, OH 43221
P: 614-457-7026**

September 2020

This brochure supplement provides information about Jason E. Farris that supplements the Waller Financial Planning Group, Inc. brochure. You should have received a copy of that brochure. Please contact us at the number referenced above if you did not receive Waller Financial Planning Group, Inc.'s brochure or if you have any questions about the contents of this supplement.

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

Jason E. Farris, CFP®

Item 2 - Educational Background and Business Experience

Year of Birth: 1980

Education:

Name of School	Year Graduated	Degree	Major
Ohio State University	2004	B.S.	Finance

Business Background:

Name of Employer	Type of Business	Title	Period of Employment
Waller Financial Planning Group, Inc.	Investment Adviser	Advisory Representative, Shareholder	04/2004 to Present
LPL, LLC	Broker/Dealer	Registered Representative	11/2008 to 11/2013
Royal Alliance Associates, Inc.	Broker/Dealer	Registered Representative	08/2008 to 11/2008

Jason has attained the following professional designation:

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by the Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;

- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

CAP® (Chartered Advisor in Philanthropy®): Provides the knowledge and tools you need to help clients articulate and advance their highest aspirations for self, family, and society. CAP® holders become members of a growing network of top planners who are working to make our towns and cities better places to live for generations to come. Courses provide an insight into the process of philanthropic planning, including, but not limited to, tax, tools and techniques.

To receive the CAP® designation, you must successfully complete all three courses, meet experience requirements and ethics standards, and agree to comply with The American College of Financial Services Code of Ethics and Procedures.

Item 3 - Disciplinary Information

Jason E. Farris is not subject to legal or disciplinary events that are material to a client or prospective client’s evaluation of him or the services offered by him.

Item 4 - Other Business Activities

Jason is not actively engaged in any other investment-related business or occupation. Further, he is not actively engaged in any other business or occupation for compensation. “Actively engaged” is deemed to mean the business activity represents more than 10 percent of his time and income.

Item 5 - Additional Compensation

Jason E. Farris does not receive any economic benefit (i.e. sales awards and other prizes) for providing advisory services from a non-client.

Item 6 - Supervision

Supervision and oversight of the activities conducted through WFPG is conducted by Jason E. Farris, Chief Compliance Officer of WFPG. Jason E. Farris can be contacted at 614-457-7026. Jason E. Farris III participates in investment committee meetings and has access to review managed accounts. Additionally, all account information required to establish an account for a client must flow through Jason E. Farris. Jason E. Farris has procedures in place to be aware of any outside business activities engaged in by WFPG advisors, oversee communications with the public, and review personal trading activities of WFPG advisors as well as in any account over which the advisors have direct or indirect beneficial interest. Furthermore, Jason has implemented a written code of ethics and policies procedures. All supervised persons are required to acknowledge their agreement to comply with the code of ethics and written policies and procedures.

Item 1

BROCHURE SUPPLEMENT

Katherine E. Kincaid, CFP[®]

**Waller Financial Planning Group, Inc.
941 Chatham Lane, Suite 212
Columbus, OH 43221
P: 614-457-7026**

September 2020

This brochure supplement provides information about Katherine E. Kincaid that supplements the Waller Financial Planning Group, Inc. brochure. You should have received a copy of that brochure. Please contact us at the number referenced above if you did not receive Waller Financial Planning Group, Inc.'s brochure or if you have any questions about the contents of this supplement.

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

Katherine E. Kincaid, CFP®

Item 2 - Educational Background and Business Experience

Year of Birth: 1977

Education:

Name of School	Year Graduated	Degree	Major
Franklin University	1999	B.S.	Finance

Business Background:

Name of Employer	Type of Business	Title	Period of Employment
Waller Financial Planning Group, Inc.	Investment Adviser	Advisory Representative	04/2002 to Present
LPL, LLC	Broker/Dealer	Registered Representative	11/2008 to 11/2013
Royal Alliance Associates, Inc.	Broker/Dealer	Registered Representative	05/2002 to 11/2008

Katherine has attained the following professional designation:

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by the Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). The CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;

- Examination – Pass the comprehensive CFP[®] Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP[®] professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP[®] marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP[®] professionals provide financial planning services at a fiduciary standard of care. This means CFP[®] professionals must provide financial planning services in the best interests of their clients.

CFP[®] professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP[®] certification.

Item 3 – Disciplinary Information

Katherine E. Kincaid is not subject to legal or disciplinary events that are material to a client or prospective client’s evaluation of her or the services offered by her.

Item 4 - Other Business Activities

Katherine is not actively engaged in any other investment-related business or occupation. Further, she is not actively engaged in any other business or occupation for compensation. “Actively engaged” is deemed to mean the business activity represents more than 10 percent of her time and income.

Item 5 - Additional Compensation

Katherine E. Kincaid does not receive any economic benefit (i.e. sales awards and other prizes) for providing advisory services from a non-client.

Item 6 - Supervision

Supervision and oversight of the activities conducted through WFPG is conducted by Jason E. Farris, Chief Compliance Officer of WFPG. Jason E. Farris can be contacted at 614-457-7026. Jason E. Farris III participates in investment committee meetings and has access to review managed accounts. Additionally, all account information required to establish an account for a client must flow through Jason E. Farris. Jason E. Farris has procedures in place to be aware of any outside business activities engaged in by WFPG advisors, oversee communications with the public, and review personal trading activities of WFPG advisors as well as in any account over which the advisors have direct or indirect beneficial interest. Furthermore, Jason has implemented a written code of ethics and policies procedures. All supervised persons are required to acknowledge their agreement to comply with the code of ethics and written policies and procedures.

Item 1
BROCHURE SUPPLEMENT

Scott E. Rendle, CFP[®]

Waller Financial Planning Group, Inc.
941 Chatham Lane, Suite 212
Columbus, OH 43221
P: 614-457-7026

September 2020

This brochure supplement provides information about Scott E. Rendle that supplements the Waller Financial Planning Group, Inc. brochure. You should have received a copy of that brochure. Please contact us at the number referenced above if you did not receive Waller Financial Planning Group, Inc.'s brochure or if you have any questions about the contents of this supplement.

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

Scott E. Rendle, CFP®

Educational Background and Business Experience

Year of Birth: 1974

Education:

Name of School	Year Graduated	Degree	Major
Ohio State University	2000	B.S.	Human Ecology with Specialty in Financial Family Management

Business Background:

Name of Employer	Type of Business	Title	Period of Employment
Waller Financial Planning Group, Inc.	Investment Adviser	Advisory Representative	07/2000 to Present
LPL, LLC	Broker/Dealer	Registered Representative	11/2008 to 11/2013
Royal Alliance Associates, Inc.	Broker/Dealer	Registered Representative	09/2000 to 11/2008

Scott has attained the following professional designation:

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design)

marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by the Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;

- Examination – Pass the comprehensive CFP[®] Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP[®] professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP[®] marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field;
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP[®] professionals provide financial planning services at a fiduciary standard of care. This means CFP[®] professionals must provide financial planning services in the best interests of their clients.

CFP[®] professionals who fail to comply with the above standards and requirements may be subject to the CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP[®] certification.

Disciplinary Information

Scott E. Rendle is not subject to legal or disciplinary events that are material to a client or prospective client’s evaluation of him or the services offered by him.

Item 4 - Other Business Activities

Scott is not actively engaged in any other investment-related business or occupation. Further, he is not actively engaged in any other business or occupation for compensation. “Actively engaged” is deemed to mean the business activity represents more than 10 percent of his time and income.

Item 5 - Additional Compensation

Scott E. Rendle does not receive any economic benefit (i.e. sales awards and other prizes) for providing advisory services from a non-client.

Item 6 - Supervision

Supervision and oversight of the activities conducted through WFPG is conducted by Jason E. Farris, Chief Compliance Officer of WFPG. Jason E. Farris can be contacted at 614-457-7026. Jason E. Farris III participates in investment committee meetings and has access to review managed accounts. Additionally, all account information required to establish an account for a client must flow through Jason E. Farris. Jason E. Farris has procedures in place to be aware of any outside business activities engaged in by WFPG advisors, oversee communications with the public, and review personal trading activities of WFPG advisors as well as in any account over which the advisors have direct or indirect beneficial interest. Furthermore, Jason has implemented a written code of ethics and policies procedures. All supervised persons are required to acknowledge their agreement to comply with the code of ethics and written policies and procedures.

CUSTOMER PRIVACY POLICY NOTICE

The information contained in this section will also be disclosed in WFPG's Privacy Policy Statement. This statement will be provided to all clients in accordance with the rules and regulations of the *Gramm-Leach-Bliley Act of 1999*.

As a registered investment advisor, Waller Financial Planning Group, Inc. and its investment adviser representatives will gather and develop personal information regarding our clients. This information will be gathered and developed by us for the following purposes:

1. To determine the client's financial goals and objectives
2. To determine the level of advisory services needed and desired by the client
3. To provide the client with specific recommendations regarding advisory services
4. To provide the client with specific recommendations regarding financial products
5. To provide ongoing support and recommendations regarding financial products held in the client's account

Client information that Waller Financial Planning Group, Inc. will collect may include, but not be limited to the following:

- Information received from clients on financial inventories through consultations with its representatives. This information may include personal and household information such as income, spending habits, investment objectives, financial goals, statements of account and other records concerning the clients' financial conditions and assets, together with information concerning employee benefits and retirement plan interests, wills, trusts, mortgages and tax returns.
- Information developed as part of financial plans, analyses or investment advisory services.
- Information concerning investment advisory account transactions, such as wrap account transactions.
- Information about clients' financial products and services transactions with Waller Financial Planning Group, Inc.

When a client account is closed, Waller Financial Planning Group, Inc. will continue to keep all client information confidential in accordance with the principles stated in its privacy policy.

A copy of the Privacy Policy Notice will be delivered to all clients in writing by at least one of the following methods:

- By hand delivering a copy to the client
- Mailing a copy to the client's address on record
- If business is conducted electronically, a notice may be posted on an electronic site as long as the client acknowledges receipt of the Privacy Policy Notice prior to the client obtaining any services or products from Waller Financial Planning Group, Inc.

A copy of the Privacy Policy Notice will be provided to the client no later than the time a client establishes a relationship with Waller Financial Planning Group, Inc., unless this situation would cause a delay in the client obtaining services and the client agrees to accept the notice at a later date. When this situation applies, a copy of the Privacy Policy Statement will be delivered to the client within a reasonable time period following the transaction.

Any time a change is made to the Privacy Policy, the statement to clients will be revised. The revised statement will be given to all affected clients prior to any disclosure of information. In addition, Waller Financial Planning Group, Inc. will provide a copy of its Privacy Policy Statement to all current and existing clients at least annually.



ADV PART 2A APPENDIX 1 WRAP FEE PROGRAM BROCHURE



January 2020

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Columbus, OH 43221
(614) 457-7026
Toll Free (800) 676-7026
Fax (614) 457-0911

801 Laurel Oak Drive, Suite 710
Naples, FL 34108
(239) 325-8505
Fax (239) 325-8506

www.waller.com

Item 1 – Cover Page

Waller Financial Planning Group, Inc.

941 Chatham Lane, Suite 212

Columbus, OH 43221

614-457-7026

www.waller.com

Date of Disclosure Brochure: January 2020

This Wrap Fee Program Brochure provides information about the qualifications and business practices of Waller Financial Planning Group, Inc. (also referred to as we, us and WFPG throughout this disclosure brochure). If you have any questions about the contents of this brochure, please contact us at (614) 457-7026 and/or info@waller.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about WFPG is also available on the Internet at www.adviserinfo.sec.gov. You can view our firm's information on this website by searching for Waller Financial Planning Group, Inc. or our firm's CRD number 159564.

*Registration as an investment adviser does not imply a certain level of skill or training.

Item 2 – Material Changes

At least annually, this section will discuss only specific material changes that are made to the Brochure and provide you with a summary of such changes. Additionally, reference to the date of the last annual update to this Brochure will be provided.

Since the last annual amendment to this brochure was filed in January 2019, the following change has been made to this disclosure brochure:

- In August 2019 Jason E. Farris replaced Charles A. Kerwood III as the firm's Chief Compliance Officer (CCO).

In the past, we have offered or delivered information about our qualifications and business practices to clients on at least an annual basis. Pursuant to new SEC Rules, we will ensure that you receive a summary of any material changes to this and subsequent brochures within 120 days of the close of our fiscal year, which is December 31. We may further provide other ongoing disclosure information about material changes as necessary.

Additionally, we will further provide you with a new brochure as necessary based on changes or new information, at any time, without charge.

Our brochure may be requested free of charge by contacting us at (614) 457-7026 and/or info@waller.com. Additional information about Waller Financial Planning Group, Inc. is also available via the SEC's website www.adviser.sec.gov. The website also provides information about any persons affiliated with Waller Financial Planning Group, Inc. who are registered, or are required to be registered, as investment adviser representatives of Waller Financial Planning Group, Inc.

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Item 4 – Services, Fees and Compensation

WFPG is an investment adviser registered with the United States Securities and Exchange Commission (“SEC”) and is a corporation formed under the laws of the State of Ohio.

WFPG offers asset management services through a wrap fee management program. In our wrap fee management program, the fee for advisory services (including asset management) and transaction costs` (including ticket charges) are “wrapped” into one fee. Our Asset Management Services are considered a wrap fee program. Whenever a fee is charged for services described in this Wrap Fee Program Brochure, we will receive all or a portion of the fee charged.

When making the determination of whether one of the advisory programs available through WFPG is appropriate for your needs, you should bear in mind that fee-based accounts, when compared with commission-based accounts, often result in lower costs during periods when trading activity is heavier, such as the year an account is established. However, during periods when trading activity is lower, the fee-based account arrangements may result in a higher annual cost for transactions. Thus, depending on a number of factors, the total cost for transactions under a fee account versus a commission account can vary significantly. Factors which affect the total cost include account size, amount of turnover, type and quantities of securities purchased or sold, commission rates and your tax situation. It should also be noted that lower fees for comparable service may be available from other sources. The exact fees and other terms will be outlined in the agreement between you and WFPG.

You should discuss the advantages and disadvantages of fee-based and commission-based accounts with your adviser representative and you should read this Wrap Fee Disclosure Brochure carefully as it explains, in detail, our Asset Management Services.

Investment Management Services

WFPG offers asset management services, which involves WFPG providing you with continuous and ongoing supervision over your accounts. The WFPG ACAP Program is a wrap fee program. In providing asset management services, WFPG will continuously monitor your account and make trades in your accounts when necessary. Your account will be managed by WFPG based on your financial situation, investment objectives and risk tolerance. WFPG will actively monitor your account and will make management recommendations and decisions regarding buying, selling, reinvesting or holding securities, cash or other investments.

We recommend that your assets to be allocated to our Asset Management Services Program be maintained in a brokerage account with TD Ameritrade Institutional TD Ameritrade Institutional TD Ameritrade Institutional, an SEC registered broker/dealer and member NYSE/SIPC. TD Ameritrade Institutional TD Ameritrade Institutional is the qualified custodian for all accounts

established through our ACAP Program. You will appoint WFPG as your investment adviser of record on specified accounts. Your account will consist only of separate account(s) held by the qualified custodian under your name. WFPG does not act as custodian to your funds and securities except to have advisory fees deducted from your account with your prior written authorization. The qualified custodian will maintain physical custody of all funds and securities of your Account, and you will retain all rights of ownership (e.g., right to withdraw securities or cash, exercise or delegate proxy voting and receive transaction confirmations) for your account.

If you have authorized us to provide asset management services on a discretionary basis, we will make all decisions to buy, sell or hold securities, cash or other investments in your managed account in our sole discretion without consulting with you before making any transactions. You must provide us with written authorization to exercise this discretionary authority, and you can place reasonable restrictions and limitations on our discretionary authority.

Fees charged for our asset management services are charged based on a percentage of assets under management, billed in advance (at the start of the billing period) on a quarterly calendar basis and calculated based on the fair market value of your account as of the last business day of the current billing period. Fees are prorated (based on the number of days service is provided during the initial billing period) for your account opened at any time other than the beginning of the billing period. If asset management services are commenced in the middle of a billing period, the prorated fee for the initial billing period is billed in arrears at the same time as the next full billing period's fee is billed.

Fees charged for our asset management services are negotiable based on the complexity of the client's situation, the potential for additional account deposits, the relationship of the client with the investment adviser representative, and the total amount of assets under management for the client.

For our asset management services, clients will be charged an annual flat fee of 0.50% of their assets under management.

There is a minimum account size of \$500,000. *See Item 5 for more details.* WFPG has a minimum annual fee of \$3,000

The only compensation received by WFPG for asset management services is the annual fee as specified in the client's advisory services agreement. WFPG receives no other forms of compensation in connection with providing asset management services.

WFPG believes that its annual fee is reasonable in relation to: (1) services provided and (2) the fees charged by other investment advisers offering similar services/programs. However, our annual investment advisory fee may be higher or lower than that charged by other investment advisers offering similar services/programs. In addition to our compensation, you may also incur charges imposed at the mutual fund level (e.g., advisory fees and other fund expenses).

The investment advisory fees will be deducted from your account and paid directly to our firm by the qualified custodian(s) of your account. You will authorize the qualified custodian(s) of your account to deduct fees from your account and pay such fees directly to our firm.

You should review your account statements received from the qualified custodian(s) and verify that appropriate investment advisory fees are being deducted. The qualified custodian(s) will not verify the accuracy of the investment advisory fees deducted.

You may incur certain charges imposed by third parties other than WFPG in connection with investments made through your account including, but not limited to, surrender charges, variable annuity fees and surrender charges, IRA and qualified retirement plan fees, and charges imposed by the qualified custodian(s) of your account. Management fees charged by WFPG are separate and distinct from the fees and expenses charged by investment company securities that may be recommended to you. A description of these fees and expenses are available in each investment company security's prospectus.

The asset management services continue in effect until terminated by either party (i.e., WFPG or you) by providing written notice of termination to the other party. Any prepaid, unearned fees will be promptly refunded by WFPG to you. Fee refunds will be determined on a pro rata basis using the number of days services are actually provided during the final period.

Block Trading

We may elect to purchase or sell the same securities for several clients at approximately the same time. This process is referred to as aggregating orders, batch trading or block trading and is used by our firm when WFPG believes such action may prove advantageous to clients. If and when we aggregate client orders, allocating securities among client accounts is done on a fair and equitable basis. Typically, the process of aggregating client orders is done in order to achieve better execution, to negotiate more favorable transaction fees or costs or to allocate orders among clients on a more equitable basis in order to avoid differences in prices and transaction fees or other transaction costs that might be obtained when orders are placed independently.

WFPG uses the pro rata allocation method for transaction allocation.

Under this procedure, pro rata trade allocation means an allocation of the trade at issue among applicable advisory clients in amounts that are proportional to the participating advisory client's intended investable assets. WFPG will calculate the pro rata share of each transaction included in a block order and assigns the appropriate number of shares of each allocated transaction executed for the client's account.

If and when we determine to aggregate client orders for the purchase or sale of securities, including securities in which WFPG or our associated persons may invest, we will do so in accordance with the parameters set forth in the SEC No-Action Letter, *SMC Capital, Inc.* Neither we nor our associated persons receive any additional compensation as a result of block trades.

Suitability and Investment Strategy

WFPG will assist clients in determining their objective(s), investment strategy, and investment suitability, prior and subsequent to opening an Asset Management account. Clients must contact us to notify of any changes in their investment objective(s) and/or financial situation. Investment strategies used to implement investment advice include, but are not necessarily limited to, long term purchases (investments held at least a year).

Item 5 – Account Requirements and Types of Clients

Minimum Account Size

WFPG requires a minimum of \$500,000 to open an account. To reach this account minimum, clients can aggregate all household accounts. Exceptions may be granted to this minimum. Such circumstances may include but not be limited to: additional assets will soon be deposited or you have other accounts under management with WFPG.

Types of Accounts

WFPG generally provides investment advice to the following types of clients:

- Individuals
- High net worth individuals
- Pension and profit-sharing plans
- Trusts, estates, or charitable organizations

You are required to execute a written agreement with WFPG specifying the particular advisory services in order to establish a client arrangement with WFPG.

Item 6 – Portfolio Manager Selection and Evaluation

WFPG and its Investment Adviser Representatives act as the portfolio manager(s) for accounts receiving our ACAP Program Services. Our ACAP Program is considered a wrap fee program. For this service, we do not allow the use of portfolio managers that are not associated with WFPG. In other words, the only portfolio managers selected for managing client assets for our ACAP Program Services are Investment Adviser Representatives of WFPG. Therefore, conflicts

of interest present in other wrap fee programs that make available both affiliated and unaffiliated portfolio managers are not present in our wrap fee program. Because our ACAP Program Services program does not provide for outside portfolio managers, we do not have procedures designed to select outside portfolio managers.

Participation in Wrap Fee Programs

WFPG offers asset management services, through our ACAP Program, which is a wrap fee management program. In our wrap fee management program, the fee for advisory services (including portfolio management or advice regarding selecting other investment advisers) and transaction services are provided for one fee. Whenever a fee is charged to a client for services described in this Wrap Fee Program Brochure, we will receive all or a portion of the fee charged.

General Description of Other Advisory Services

The following are descriptions of the primary advisory services of WFPG. Please understand that a written agreement, which details the exact terms of the service, must be signed by you and WFPG before we can provide you the services described below.

Financial Planning Services - WFPG offers financial planning services, which involve preparing a written financial plan covering specific or multiple topics. We provide full written financial plans, which typically address the following topics: estate and retirement planning, employee benefit planning, insurance plans, securities, tax shelters, and capital accumulation methods. WFPG may also advise on income, gift and estate taxes as well as provide advice regarding the purchase, sale or disposition of insurance or assets other than securities or investments. When providing financial planning services, the role of your investment adviser representative is to find ways to help you understand your overall financial situation and help you set financial objectives. Written financial plans prepared by us under this Agreement do not include specific recommendations of individual securities.

Our financial planning services do not involve implementing any transaction on your behalf or the active and ongoing monitoring or management of your investments or accounts. You have the sole responsibility for determining whether to implement our financial planning recommendations. To the extent that you would like to implement any of our investment recommendations through WFPG or retain WFPG to actively monitor and manage your investments, you must execute a separate written agreement with WFPG for our asset management services.

Limits Advice to Certain Types of Investments

WFPG provides investment advice on the following types of investments:

- Mutual Funds
- Exchange Traded Funds (ETFs)

Although we generally provide advice only on the products previously listed, we reserve the right to offer advice on any investment product that may be suitable for each client's specific circumstances, needs, goals and objectives.

When providing asset management services, WFPG typically constructs each client's account holdings using Mutual Funds and Exchange Traded funds to build diversified portfolios. It is not our typical investment strategy to attempt to time the market, but we may increase cash holdings modestly as deemed appropriate based on your risk tolerance and our expectations of market behavior. We may modify our investment strategy to accommodate special situations such as low basis stock, stock options, legacy holdings, inheritances, closely held businesses, collectibles, or special tax situations.

Tailor Advisory Services to Individual Needs of Clients

WFPG's advisory services are always provided based on your individual needs. This means, for example, that when we provide asset management services, you are given the ability to impose restrictions on the accounts we manage for you, including specific investment selections and sectors. We work with you on a one-on-one basis through interviews and questionnaires to determine your investment objectives and suitability information.

We will not enter into an investment adviser relationship with a prospective client whose investment objectives may be considered incompatible with our investment philosophy or strategies or where the prospective client seeks to impose unduly restrictive investment guidelines.

Performance-Based Fees and Side-By-Side Management

Performance-based fees are defined as fees based on a share of capital gains on or capital appreciation of the assets held in a client's account. **WFPG does not charge or accept performance-based fees.**

Methods of Analysis, Investment Strategies and Risk of Loss

WFPG conducts economic analysis and attempts to analyze and determine the trends. Additionally, WFPG uses data from various sources, on a subscription basis, such as Morningstar for mutual fund screening on a quarterly basis. These sources may use fundamental and technical analysis in their research. Fundamental analysis generally involves assessing a company's or security's value based on factors such as sales, assets, markets, management, products and services, earnings, and financial structure. Technical analysis generally involves studying trends and movements in a security's price, trading volume, and other market-related

factors in an attempt to discern patterns.

You are advised investing in securities involves risk of loss, including the potential loss of principal. Your participation in any of the management programs offered by WFPG will require you to be prepared to bear the risk of loss and fluctuating performance.

WFPG does not represent, warranty or imply that the services or methods of analysis used by WFPG can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to major market corrections. Past performance is no indication of future performance. No guarantees can be offered that your goals or objectives will be achieved. Further, no promises or assumptions can be made that the advisory services offered by WFPG will provide a better return than other investment strategies.

WFPG uses exchange traded funds and mutual funds. When investing in an ETF or mutual fund, you will bear additional expenses based on your pro rata share of the ETF's or mutual fund's operating expenses, including the potential duplication of management fees. The risks with exchange traded funds and mutual funds include:

- **Manager Risk:** The risk that an actively managed mutual fund's investment adviser will fail to execute the fund's stated investment strategy.
- **Market Risk:** The risk that the Stock Market will decline, decreasing the value of the securities contained within the mutual funds we recommend to you.
- **Industry Risk:** The risk that a group of stocks in a single industry will decline in price due to adverse developments in that industry, decreasing the value of mutual funds that are significantly invested in that industry.
- **Inflation Risk:** The risk that the rate of price increases in the economy deteriorates the returns associated with the mutual fund.

Voting Client Securities

WFPG does not vote proxies on behalf of Clients. We have determined that taking on the responsibilities for voting client securities does not add enough value to the services provided to you to justify the additional compliance and regulatory costs associated with voting client securities. Therefore, it is your responsibility to vote all proxies for securities held in the Account.

You will receive proxies directly from the qualified custodian or transfer agent; we will not provide you with the proxies. You are encouraged to read through the information provided with the proxy-voting documents and make a determination based on the information provided.

Item 7 – Client Information Provided to Portfolio Managers

Only Investment Adviser Representatives of WFPG serve as portfolio managers for our ACAP Program. Our associated Investment Adviser Representatives are responsible for gathering all information provided by you. We will interview and work with you to gather all information needed relative to your investment objectives and needs in order to provide management services through our ACAP Program. You are responsible for promptly contacting your Investment Adviser Representative to notify us of any changes to your financial situation that will impact or materially influence the way we manage your accounts. Since we do not use any outside portfolio managers, we do not share your information with any outside portfolio managers.

Item 8 - Client Contact with Portfolio Managers

Only Investment Adviser Representatives of WFPG serve as portfolio managers for our ACAP Program. There are no restrictions placed on your ability to contact and consult with their portfolio managers. It is the policy of WFPG to provide for open communications between the Investment Adviser Representatives and clients. You are encouraged to contact your Investment Adviser Representative whenever you have questions about the management of your account(s).

Item 9 - Additional Information

Disciplinary Information

We have no legal or disciplinary events that are material to a client's or prospective client's evaluation of our business or the integrity of our management.

Other Financial Industry Activities and Affiliations

WFPG is **not** and does **not** have a related person that is a broker/dealer, municipal securities dealer, government securities dealer or broker, an investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund), another investment adviser or financial planner, a futures commission merchant, commodity pool operator, or commodity trading advisor, a banking or thrift institution, an accountant or accounting firm, a lawyer or law firm, a pension consultant, a real estate broker or dealer, and a sponsor or syndicator of limited partnerships.

We are an independent registered investment adviser and only provide investment advisory services. We are not engaged in any other business activities and offer no other services except those described in this Disclosure Brochure. However, while we do not sell products or services

other than investment advice, our representatives may sell other products or provide services outside of their role as investment adviser representatives with WFPG.

Interest in Client Transactions and Code of Ethics

- A. WFPG has a fiduciary duty to you to act in your best interest and always place your interests first and foremost. WFPG takes seriously its compliance and regulatory obligations and requires all staff to comply with such rules and regulations as well as WFPG's policies and procedures. Further, WFPG strives to handle your non-public information in such a way to protect information from falling into hands that have no business reason to know such information and provides you with WFPG's Privacy Policy. As such, WFPG maintains a code of ethics for its Advisory Representatives, supervised persons and staff. The Code of Ethics contains provisions for standards of business conduct in order to comply with federal securities laws, personal securities reporting requirements, pre-approval procedures for certain transactions, code violations reporting requirements, and safeguarding of material non-public information about your transactions. Further, WFPG's Code of Ethics establishes WFPG's expectation for business conduct. A copy of our Code of Ethics will be provided to you upon request.
- B. Neither WFPG nor its associated persons recommends to clients or buys or sells for client accounts any securities in which we have a material financial interest.
- C. WFPG and its associated persons may buy or sell securities identical to those securities recommended to you. Therefore, WFPG and/or its associated persons may have an interest or position in certain securities that are also recommended and bought or sold to you. WFPG and its associated persons will not put their interests before your interest. WFPG and its associated persons may not trade ahead of you or trade in such a way to obtain a better price for themselves than for you or other clients.
- D. WFPG is required to maintain a list of all securities holdings for its associated persons and develop procedures to supervise the trading activities of associated persons who have knowledge of your transactions and their related family accounts at least quarterly. Further, associated persons are prohibited from trading on non-public information or sharing such information.

Account Reviews

Managed accounts are reviewed at least semi-annually. While the calendar is the main triggering factor, reviews can also be conducted at your request. Account reviews will include investment strategy and objectives review and making a change if strategy and objectives have changed. Reviews are conducted by Investment Advisor Representative, with reviews performed in accordance with your investment goals and objectives.

Account Statements and Reports

For our asset management services, you are provided with transaction confirmation notices and regular quarterly account statements directly from the qualified custodian.

You are encouraged to always compare any reports or statements provided by us, a sub-adviser or third-party money manager against the account statements delivered from the qualified custodian. When you have questions about your account statement, you should contact our firm and the qualified custodian preparing the statement.

Client Referrals and Additional Compensation

WFPG does not enter into agreements with any persons to refer clients to WFPG.

We may from time to time receive expense reimbursement for travel from the account custodian. Travel expense reimbursements are typically a result of attendance at due diligence and/or investment training events. This creates a conflict of interest in that there is an incentive to recommend certain account custodians based on the receipt of this compensation instead of what is in the best interest of our clients. We attempt to control for this conflict by always basing investment decisions on the individual needs of our clients.

Financial Information

WFPG does not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance. Therefore, we are not required to include a balance sheet for the most recent fiscal year. We are not subject to a financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients. Finally, WFPG has not been the subject of a bankruptcy petition at any time.

Item 10 - Customer Privacy Policy Notice

The information contained in this section will also be disclosed in WFPG's Privacy Policy Statement. This statement will be provided to all clients in accordance with the rules and regulations of the *Gramm-Leach-Bliley Act of 1999*.

As a registered investment advisor, Waller Financial Planning Group, Inc. and its investment adviser representatives will gather and develop personal information regarding our clients. This information will be gathered and developed by us for the following purposes:

1. To determine the client's financial goals and objectives
2. To determine the level of advisory services needed and desired by the client

3. To provide the client with specific recommendations regarding advisory services
4. To provide the client with specific recommendations regarding financial products
5. To provide ongoing support and recommendations regarding financial products held in the client's account

Client information that Waller Financial Planning Group, Inc. will collect may include, but not be limited to the following:

- Information received from clients on financial inventories through consultations with its representatives. This information may include personal and household information such as income, spending habits, investment objectives, financial goals, statements of account and other records concerning the clients' financial conditions and assets, together with information concerning employee benefits and retirement plan interests, wills, trusts, mortgages and tax returns.
- Information developed as part of financial plans, analyses or investment advisory services.
- Information concerning investment advisory account transactions, such as wrap account transactions.
- Information about clients' financial products and services transactions with Waller Financial Planning Group, Inc.

When a client account is closed, Waller Financial Planning Group, Inc. will continue to keep all client information confidential in accordance with the principles stated in its privacy policy.

A copy of the Privacy Policy Notice will be delivered to all clients in writing by at least one of the following methods:

- By hand delivering a copy to the client
- Mailing a copy to the client's address on record
- If business is conducted electronically, a notice may be posted on an electronic site as long as the client acknowledges receipt of the Privacy Policy Notice prior to the client obtaining any services or products from Waller Financial Planning Group, Inc.

A copy of the Privacy Policy Notice will be provided to the client no later than the time a client establishes a relationship with Waller Financial Planning Group, Inc., unless this situation would cause a delay in the client obtaining services and the client agrees to accept the notice at a later date. When this situation applies, a copy of the Privacy Policy Statement will be delivered to the client within a reasonable time period following the transaction.

Any time a change is made to the Privacy Policy, the statement to clients will be revised. The revised statement will be given to all affected clients prior to any disclosure of information. In addition, Waller Financial Planning Group, Inc. will provide a copy of its Privacy Policy Statement to all current and existing clients at least annually.

PRIVACY NOTICE REGARDING CLIENT PRIVACY

Maintaining the trust and confidence of our clients is a high priority. That is why we want you to understand how we protect your privacy when we collect and use information about you, and the steps that we take to safeguard that information. This notice is provided to you on behalf of Waller Financial Planning Group, Inc.

Information We Collect: In connection with providing investment products, financial advice, or other services, we obtain non-public personal information about you, including:

- Information we receive from you on account applications, such as your address, date of birth, Social Security Number, occupation, financial goals, assets, and income;
- Information about your transactions with us, our affiliates, or others; and
- Information received from credit or service bureaus or other third parties, such as your credit history or employment status.

Categories of Information We Disclose: We may disclose all information that we collect. Waller Financial Planning Group, Inc. and its affiliates do not sell customer lists and will not sell your name to telemarketers.

Categories of Parties to Whom We Disclose: We will not disclose information regarding you or your account with us, except under the following circumstances:

- To your authorized Financial Advisor and his or her manager; Waller Financial Planning Group, Inc. permits Financial Advisors and Investment Advisers that terminate their affiliation with Waller Financial Planning Group, Inc. to make copies of their client files.
- To your Custodians or their affiliates, to the extent permitted by law;
- To entities that perform services for us or function on our behalf, including financial service providers, such as a clearing broker-dealer, investment company, or insurance company;
- To consumer reporting agencies;
- To third parties who perform services or marketing on our behalf;
- To your attorney, trustee or anyone else who represents you in a fiduciary capacity;
- To our attorneys, accountants or auditors; and
- To government entities or other third parties in response to subpoenas or other legal processes as required by law or to comply with regulatory inquiries;
- We may disclose non-public personal information about you in connection with the transfer of your account to another financial institution at your request or the request of your advisor. If you do not want Waller Financial Planning Group, Inc. to disclose your non-public personal information with your advisor's new financial institution, please contact us as directed below.

How We Use Information: Information may be used by your Custodians. They perform support services for us, such as data processors, technical systems consultants, and programmers, or companies that help us market products and services to you for a number of purposes, such as:

- To protect your accounts from unauthorized access or identity theft;
- To process your requests, such as securities purchases and sales;
- To establish or maintain an account with an unaffiliated third party, such as a clearing broker-dealer providing services to you and/or Waller Financial Planning Group, Inc.;
- To service your accounts, such as issuing checks and account statements;
- To comply with Federal, State, and Self-Regulatory Organization requirements; and
- To keep you informed about financial services of interest to you.

Our Security Policy: We restrict access to non-public personal information about you to those individuals who need to know that information to provide products or services to you and perform their respective duties. We maintain physical, electronic, and procedural security measures to safeguard confidential client information.

Closed or Inactive Accounts: If you decide to close your account(s) or become an inactive customer, our Privacy Policy will continue to apply to you.

Complaint Notification: Please direct complaints to Waller Financial Planning Group, Inc., 941 Chatham Lane, Suite 212, Columbus, OH 43221, and (614) 457-7026.

Changes to This Privacy Policy: If we make any substantial changes in the way we use or disseminate confidential information, we will notify you. If you have any questions concerning this Privacy Policy, please write to Waller Financial Planning Group, Inc., 941 Chatham Lane, Suite 212, Columbus, OH 43221 (614) 457-7026.