

## Item 1 Cover Page

### **Part 2A of Form ADV Firm Brochure**

**PEACE OF MIND PLANNING, LLC  
CRD: 307997**

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Bellevue, WA 98006**

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**Chief Compliance Officer: [blair@pomplanning.net](mailto:blair@pomplanning.net)**

December 1, 2022

This brochure provides information about the qualifications and business practices of Peace of Mind Planning, LLC. If you have any questions about the contents of this brochure, please contact us at 949-485-2598 or via email to [blair@strategicmp.net](mailto:blair@strategicmp.net). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority. Registration with the SEC or state regulatory authority does not imply a certain level of skill or expertise.

Additional information about Peace of Mind Planning, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 Material Changes

As a registered investment adviser, we must ensure that our brochure is current and accurate and makes full disclosure of all material facts relating to the advisory relationship. If there have been any material changes to our business or advisory practices since our last annual update, we will provide a description of such material changes here.

Since Peace of Mind Planning's most recent annual amendment filing, dated April 1, 2022, this brochure has been amended as follows:

- At Item 1 to reflect the firm's new principal place of business.
- At Item 1 to update the contact email address for Blair Schadler.
- At Item 4 to update the firm's ownership structure.
- At Item 4 to incorporate disclosure regarding fiduciary status and rollover recommendations with respect to retirement clients.
- At Items 4 and Item 5 to more revise the description of portfolio management and financial planning services and associated fees.
- At Item 5 to incorporate disclosure regarding technology fees that may be assessed by the firm's affiliated investment manager/sub-adviser.
- At Item 6 to incorporate disclosure regarding performance-based compensation that may be received by one or more affiliates for private fund management services.
- At Item 7 to incorporate disclosure regarding minimum asset level requirements that may be applied by investment managers and/or sub-advisers that are appointed to manage client assets.
- At Item 10 to incorporate disclosure regarding new affiliated entities and related material conflicts of interest in connection with the firm's ownership change.
- At Item 19 to incorporate disclosure regarding the firm's new management person.

We encourage you to read through our ADV Disclosure Brochure in its entirety to fully understand the services we provide and the associated fees.

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## **Item 4 Advisory Business**

### **Description of Peace of Mind Planning, LLC**

Peace of Mind Planning, LLC ("Peace of Mind Planning" or "the Firm") is a Limited Liability Company ("LLC") organized in the State of Michigan. In June 2020, the Firm became a registered state-investment advisor and is currently seeking registration with the United States Securities and Exchange Commission. The Firm is principally owned by Synergy Financial Services, Inc., which is wholly owned by Joseph Maas.

Please refer to the description of each investment advisory service listed below for information on how we tailor our advisory services to your individual needs. As used in this brochure, the words "the Firm", "we," "our," and "us" refer to Peace of Mind Planning and the words "you," "your," and "client" refer to you as either a client or prospective client of our Firm.

### **Services Offered**

#### **Portfolio Management and Selection of Other Advisers**

Peace of Mind Planning, LLC can be engaged for portfolio management services on either a discretionary or non-discretionary basis. Peace of Mind Planning, LLC generally does not manage assets directly, but will instead typically recommend or select one or more third-party investment managers and sub-advisers to manage all or a portion of the client's assets. Responsibility for determining whether services from a particular sub-adviser are appropriate for a particular client is vested exclusively with the firm.

With respect to non-discretionary engagements, clients are advised that Peace of Mind Planning, LLC cannot affect any account transactions without obtaining prior consent to any such transaction(s) from the client. Thus, in the event that we would like to make a transaction for your account (including in the event of an individual holding or general market correction), and you are unavailable, we will be unable to effect the account transaction(s) (as we would for our discretionary clients) without first obtaining your consent.

#### **Client-Tailored Services and Client-Imposed Restrictions**

We will assist clients with building a customized portfolio using model portfolios provided by select sub-advisers. With respect to sub-advised services, clients select a category of risk based on an assessment of their individual risk tolerance and investment objectives, to which one or more model portfolios are then correlated. We will recommend to client's what portion of their assets may be invested in the portfolios and discuss the allocation of their assets among the portfolios, but they will determine what assets will be invested in which portfolios. Clients may, other than for model portfolios constructed by a sub-adviser, impose reasonable restrictions on the management of their accounts, for example, restricting the type or amount of security to be purchased in the portfolio.

#### **Financial Planning Services**

Financial planning is a comprehensive evaluation of a client's current and future financial state by using currently known variables to predict future cash flows, asset values and withdrawal plans. Through the financial planning process, all questions, information and analysis are considered as they impact and are impacted by the entire financial and life situation of the client.

Clients electing this service receive a written report which provides the client with a detailed financial plan designed to assist the client achieve his or her financial goals and objectives. We gather required information through in-depth personal interviews. Information gathered includes the client's current financial status, tax status, future goals, returns objectives and attitudes towards risk. We carefully review documents supplied by the client, including a questionnaire completed by the client, and prepare a written report.

Peace of Mind Planning, LLC's financial planning recommendations may present conflicts of interest, particularly when such recommendations could increase the compensation received by Peace of Mind Planning, LLC, its affiliates, and/or any representative(s) thereof. For example, as discussed further in Item 10 below, recommendations to purchase commission-based insurance products from a Peace of Mind Planning, LLC representative in their capacity as a licensed insurance agent, or from an affiliated insurance agency, presents a conflict of interest, as the recommendation could be made on the basis of commissions to be received, rather than on a particular client's needs. Peace of Mind Planning, LLC seeks to mitigate this conflict by providing full and fair disclosure of the conflict and by only making such recommendations when in the client's best interest. The client is under no obligation to act upon the recommendations provided by Peace of Mind Planning, LLC, its affiliates, and/or any representative(s) thereof. If the client does elect to act upon any recommendation, the client is free to complete the transaction with the professional(s) of their choosing and is under no obligation to complete the transaction through Peace of Mind Planning, LLC, its affiliates, and/or any representative(s) thereof. Material conflicts involved in the advisory relationship between Peace of Mind Planning, LLC and the client are fully and fairly disclosed herein. Should additional material conflicts arise in the future, Peace of Mind Planning, LLC will promptly provide full and fair disclosure of same, either herein, through a separate, standalone communication, or both.

### **Types of Investments**

We primarily offer advice on equity securities, corporate debt securities, certificates of deposit, mutual fund shares, United States government securities, money market funds, exchange-traded REITs, and ETFs.

For eligible clients, and when consistent with a client's applicable financial situation, risk tolerance, and investment objectives, we (and/or one or more of our sub-advisers or co-providers) may also advise on alternative investments, such as interests in partnerships investing in real estate, interests in partnerships investing in oil and gas interests, and interests in partnerships investing in private equity.

Additionally, we may advise you on various types of investments based on your stated goals and objectives. We may also provide advice on any type of investment held in your portfolio at the inception of our advisory relationship. Since our investment strategies and advice are based on each client's specific financial situation, the investment advice we provide to you may be different or conflicting with the advice we give to other clients regarding the same security or investment. In addition, not all asset classes described in this section will be prudent or appropriate for all clients. Accordingly, there may be periods of time during which certain asset types, such as alternative investments, are not recommended or utilized in client accounts.

### **Retirement Plan Asset Management Services**

We offer investment management services to tax-qualified retirement plans, hereafter referred to as "Plan Clients". Most Plan Clients are defined contribution plans that allow participants to direct the investment of their plan accounts among investment options selected by a responsible fiduciary of the Plan Client ("Responsible Fiduciary"). Other Plan Clients do not offer participant investment direction, in which case the Responsible Fiduciary selects the Plan Client's investment funds. Plan Clients are generally subject to the provisions of the Employee Retirement Income Security Act of 1974, as amended ("ERISA"). All Plan Client assets are held by a qualified independent custodian. Under no circumstances do we hold custody of Plan Client assets

If the Plan Client's responsible fiduciary selects us to offer actively managed investment options, we make available the Third-Party Money Manager programs approved for use in tax-qualified retirement plans. Please note that not all Third-Party Money Managers or strategies utilized by Peace of Mind Planning are approved for use under this section. In some circumstances, Peace of Mind Planning, LLC

has delegated trading authority to the Third-Party Money Manager. In other circumstances, we will place trades according to trading instructions received from the Third-Party Money Manager.

The responsible fiduciary may also select various index funds as investment options.

### **Miscellaneous Disclosures**

**Retirement Rollovers-Potential for Conflict of Interest:** A client or prospective client leaving an employer typically has four options regarding an existing retirement plan (and may engage in a combination of these options): (i) leave the money in the former employer's plan, if permitted, (ii) roll over the assets to the new employer's plan, if one is available and rollovers are permitted, (iii) roll over to an Individual Retirement Account ("IRA"), or (iv) cash out the account value (which could, depending upon the client's age, result in adverse tax consequences). If Peace of Mind Planning recommends that a client roll over their retirement plan assets, such a recommendation creates a conflict of interest if the Firm will earn a new (or increase its current) advisory fee as a result of the rollover. No client is under any obligation to roll over retirement plan assets, regardless of Peace of Mind Planning's recommendation.

**ERISA / IRC Fiduciary Acknowledgment.** When Peace of Mind Planning provides investment advice to a client regarding the client's retirement plan account or individual retirement account, it does so as a fiduciary within the meaning of Title I of the Employee Retirement Income Security Act ("ERISA") and/or the Internal Revenue Code ("IRC"), as applicable, which are laws governing retirement accounts. The way Peace of Mind Planning makes money creates some conflicts with client interests, so the Firm operates under a special rule that requires it to act in the client's best interest and not put its interests ahead of the client's.

Under this special rule's provisions, Peace of Mind Planning must:

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

### **Wrap Fee Programs**

Peace of Mind Planning, LLC does not sponsor or serve as a portfolio manager for any wrap fee programs. However, Peace of Mind Planning, LLC may select or recommend a third-party adviser and/or third-party managed portfolio through which assets may be managed on a wrap fee basis. When client assets are managed on a wrap fee basis, the wrap program sponsor arranges for the client to receive investment advisory services, the execution of securities brokerage transactions, custody and reporting services for a single specified fee. Participation in a wrap program may cost the participant more or less than purchasing such services separately.

### **Assets Under Management**

As of June 30, 2022, Peace of Mind Planning, LLC had \$8,962,825 in discretionary assets under management and \$0 in non-discretionary assets under management.

## **Item 5 Fees and Compensation**

The fees for the advisory services, as outlined below, may be payable in arrears or in advance, as set

forth in the client services agreement. All applicable fees, fee payment arrangements and the terms of engagement are clearly set forth in this agreement prior to services being rendered.

### **Portfolio Management and Selection of Other Advisers**

Fees for Portfolio Management and Selection of Other Advisers services are assessed on an asset-based fee basis. Peace of Mind's asset-based fees are negotiable and generally range from 0.50% to 1.75% of client assets under management. These fees are individually negotiated on a case-by-case basis with the client prior to initiating an engagement. Negotiations will be based upon a variety of factors, including but not limited to, the scope of overall services to be rendered, the value of client assets (potentially including those assets not under management), friends and family, related accounts, and other factors. As a result, similarly situated clients may pay varying fees and the services to be provided may be available from other advisers for similar or lower fees.

### **Retirement Plan Asset Management Services**

Peace of Mind Planning, LLC's fees for Retirement Plan Asset Management Services are individually negotiated on a case-by-case basis and will generally range from 0.50% to 1.75% of plan assets.

These fees are negotiable based upon a variety of factors, including but not limited to, the scope of services to be rendered, the representative servicing the account, the amount of plan assets, the expected amount of time needed to render the requested services, and other factors. Due to the negotiability of fees, similarly-situated clients could pay differing fees and the services to be provided by Peace of Mind Planning, LLC may be available from other sources for the same or lesser fees.

### **Financial Planning Fees**

To the extent specifically requested by a client, Peace of Mind Planning, LLC may determine to provide financial planning and/or consulting services (including investment and non-investment related matters, including estate planning, insurance planning, etc.) on a stand-alone fee basis. The firm's planning and consulting fees are negotiable, but generally range from \$500 to \$25,000 on a fixed fee basis, depending upon the level and scope of the service(s) required and the professional(s) rendering the service(s). Hourly planning and consulting engagements are also available at a rate of \$250 per hour.

### **Fee Payments**

Asset-based fees are billed quarterly, in advance, based upon the value of the managed assets as of the last day of the prior quarter period. Initial fees will be prorated if the investment advisory relationship commences other than at the beginning of a billing period.

In most engagements, the third-party investment manager and/or sub-adviser will deduct advisory fees directly from the client's account provided that (i) the client provides written authorization to the qualified custodian, and (ii) the qualified custodian sends the client a statement, at least quarterly, indicating all amounts disbursed from the account. The cost of the third-party investment manager's and/or sub-adviser's services is paid from Peace of Mind Planning's advisory fee, resulting in no additional charge to the client. The client is encouraged to review the custodian statement to verify the accuracy of the fee calculation, as the client's custodian will not verify the calculation.

Upon termination, a fee refund will be provided, prorated based on the number of days in the fee period until the effective date of termination.

Peace of Mind Planning, LLC's Financial Planning and Consulting fees are generally invoiced directly to the client. The client is generally asked to pay such fees by check, upon receipt of the firm's invoice. Peace of Mind Planning, LLC may request that up to fifty percent (50%) of the total estimated fee be paid at the outset of the client engagement. Notwithstanding the foregoing, the firm does not solicit or require prepayment of \$500 or more in fees, six months or more in advance. Generally, the balance of the fee will become payable at the conclusion of the firm's services.

If a fixed fee Financial Planning and Consulting engagement is terminated prior to completion, Peace of Mind Planning, LLC will provide a refund of the advance-paid fee, prorated based on the amount of work completed at the time of termination based on the firm's then-current hourly rate. If the amount owed for Peace of Mind Planning, LLC's services exceeds the initial advance payment amount, the client will be invoiced for the remaining amount due, and the client will not be entitled to a refund.

If an hourly Financial Planning and Consulting engagement is terminated prior to completion, Peace of Mind Planning, LLC will invoice the client at its then-current hourly rate, based on the amount of time spent conducting services through termination, offset against any advance-paid hourly fees. If applicable, the firm will then provide a refund of any unearned hourly fees.

For both fixed fee and hourly engagements, Legion will deliver to the client whatever portions of the planning report or analysis were completed at the time of termination.

### **Compensation for the Sale of Other Investment Products**

Firm representatives may operate as an independent insurance agent and will earn commission-based compensation for selling insurance products, including insurance products he sells to you. Insurance commissions earned by Mr. Schadler are separate from our advisory fees. This practice presents a conflict of interest because Mr. Schadler has an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. You are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with our firm.

### **Additional Fees and Expenses**

In addition to any applicable advisory fees, the client may incur brokerage commissions and/or transaction fees for effecting securities transactions, in accordance with the fee schedules and practices of the applicable broker-dealer/qualified custodian. Please see Item 12 below for further discussion on brokerage practices.

Clients whose assets are placed under the management of our affiliated investment manager/sub-adviser (please see Item 10 below) will be assessed a \$30 annual technology fee, payable over equal quarterly installments. If a client is onboarded in the middle of a billing quarter, the first quarterly installment of the technology fee will first be assessed at the client's first billing interval and will include a non-prorated technology fee applied in arrears for the first partial quarter of services, as well as an advance payment of the following quarter's technology fee. Upon termination, no refunds will be provided with respect to technology fees collected in advance.

In addition, the client will also incur, relative to all pooled investment vehicles, such as mutual funds and exchange traded funds, charges imposed at the investment vehicle level (e.g., management fees and other expenses). These fees and charges are disclosed in the respective fund's prospectus. Clients are advised to read these materials carefully before investing. If a mutual fund also imposes sales charges, the client may pay an initial or deferred sales charge as further described in the mutual fund's prospectus. A client using Peace of Mind Planning, LLC may be precluded from using certain mutual funds because they may not be offered by the client's custodian.

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

We do not accept performance-based fees or participate in side-by-side management. Performance-based fees are fees that are based on a share of a capital gains or capital appreciation of a client's account. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees. Our fees are calculated as described in the *Fees and Compensation* section above and are



not charged on the basis of a share of capital gains upon, or capital appreciation of, the funds in your advisory account.

Peace of Mind Planning's affiliates, Rowan Street Advisors, LLC and Synergy Asset Management, LLC (described in further detail in Item 10 below), serve as Managing Members to the Rowan Street Capital, LLC private fund (the "Fund"). The Fund pays its Managing Members a performance incentive fee (only for qualified clients) for performance in excess of a specified hurdle. Specific details describing management and incentive fees are more fully described in the offering documents for the Fund.

Fund performance fees are charged in accordance with the requirements of Rule 205-3 under the Investment Advisers Act of 1940, as amended. Specifically:

- In measuring assets for the calculation of performance-based fees, realized and unrealized capital gains and losses are included.
- Procedures have been designed and implemented to ensure that all clients subject to any performance or incentive fee arrangements are treated fairly and equally.
- Upon the redemption or withdrawal of an investor's interest in the Fund, the pro-rata portion of the performance allocation or fee allocation is charged at the next instance a performance fee is assessed.
- The Fund is subject to an annual audit conducted by a qualified, PCAOB member, independent auditor.

The potential receipt of performance-based compensation from the Fund creates a conflict because Peace of Mind Planning charges advisory clients an asset-based fee for the services it provides, Peace of Mind Planning's affiliated Fund managers are entitled to receive performance-based fees or allocations from the Fund. As a result, Peace of Mind Planning has an incentive to recommend that an advisory client invest in the Fund, as opposed to holding assets only in separate accounts and allocating those assets to investment options through which Peace of Mind Planning's affiliates would not be entitled to receive performance-based fees or allocations.

Peace of Mind Planning seeks to address this conflict by emphasizing our duty to place the interests of its clients first, regardless the potential for additional compensation to the Firm's affiliate(s).

## **Item 7 Types of Clients**

We offer investment advisory services to individuals, high net worth individuals and pension and profit sharing plans (other than plan participants). Plan participants may enter into an advisory agreement with the Firm separate and apart from their relationship with a pension or profit sharing plans.

In general, we require a minimum of twenty five thousand dollars (\$25,000.00) to open and maintain an advisory account. At our discretion, we may waive this minimum account size. For example, we may waive the minimum if you appear to have significant potential for increasing your assets under our management. We may also combine account values for you and your minor children, joint accounts with your spouse, and other types of related accounts to meet the stated minimum.

Certain third-party investment managers and/or sub-advisers may impose minimum asset level requirements upon clients, to which Peace of Mind Planning clients may be subject. Peace of Mind Planning generally will not recommend the services of any such third-party if the client does not meet the minimum account size criteria, unless a waiver to such requirement is granted.

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

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear. There is no guarantee that any specific investment or strategy will be profitable for a particular client.**

Peace of Mind Planning, LLC may assist the client in selecting one or more appropriate third-party sub-advisers for all or a portion of the client's portfolio. Such advisers will typically manage assets for clients who commit a minimum amount of assets established by that adviser – a factor that Peace of Mind Planning, LLC will take into account when recommending managers to clients.

Through Peace of Mind Planning, LLC's selection of sub-advisers, clients will have access to securities portfolios consisting of stocks, bonds, mutual funds, exchange-traded funds, and other securities and/or contracts relating to the same that are developed, maintained, and modified by the sub-advisers. Sub-advisers may outsource the construction, monitoring, or modification of the portfolios to third parties at their expense and in their discretion.

A description of the criteria to be used in formulating an investment recommendation to invest in certain third-party sub-advisers is set forth below.

Peace of Mind Planning, LLC has formed relationships with third-party vendors that:

- provide a technological platform for separate account management;
- prepare performance reports;
- perform trading;
- perform or distribute research of individual securities; and/or
- perform billing and certain other administrative tasks.

Peace of Mind Planning, LLC may utilize additional independent third parties to assist it in recommending and monitoring advisers to clients as appropriate under the circumstances.

Peace of Mind Planning, LLC reviews certain quantitative and qualitative criteria related to advisers and to formulate investment recommendations to its clients. Quantitative criteria may include:

- the performance history of an adviser evaluated against that of its peers and other benchmarks;
- an analysis of risk-adjusted returns;
- an analysis of the adviser's contribution to the investment return (e.g., manager's alpha);
- standard deviation of returns over specific time periods, sector and style analysis;
- the adviser's fee structure; and
- the relevant portfolio manager's tenure.

Qualitative criteria used in selecting/recommending advisers include the investment objectives and/or management style and philosophy of an adviser; an adviser's consistency of investment style; and employee turnover and efficiency and capacity.

Quantitative and qualitative criteria related to advisers are reviewed by Peace of Mind Planning, LLC on a quarterly basis or such other interval as appropriate under the circumstances. In addition, advisers are reviewed to determine the extent to which their investments reflect efforts to time the market, or evidence style drift such that their portfolios no longer accurately reflect the particular asset category attributed to the adviser by Peace of Mind Planning, LLC (both of which are negative factors in implementing an asset allocation structure).

Also, account minimum balances and fees may significantly differ between clients. Each client's individual needs and circumstances will determine portfolio weighting, which can have an impact on fees given the funds or managers utilized. Peace of Mind Planning, LLC will endeavor to obtain equal treatment for its clients with advisers but cannot assure equal treatment.

Peace of Mind Planning, LLC will regularly review the activities of managers utilized for the client. Clients that engage sub-advisers or should first review and understand the disclosure documents of those sub-advisers, which contain information relevant to such retention or investment, including information on the methodology used to analyze securities, investment strategies, fees and conflicts of interest.

Please refer to the sub-adviser's ADV Part 2A Brochure for information on material risks of investment instruments.

### **Tax Considerations**

Our strategies and investments may have unique and significant tax implications. However, unless we specifically agree otherwise, and in writing, tax efficiency is not our primary consideration in the management of your assets. Regardless of your account size or any other factors, we strongly recommend that you consult with a tax professional regarding the investing of your assets.

Custodians and broker-dealers must report the cost basis of equities acquired in client accounts. Your custodian will default to the First-In First-Out ("FIFO") accounting method for calculating the cost basis of your investments. You are responsible for contacting your tax advisor to determine if this accounting method is the right choice for you. If your tax advisor believes another accounting method is more advantageous, provide written notice to our firm immediately and we will alert your account custodian of your individually selected accounting method. Decisions about cost basis accounting methods will need to be made before trades settle, as the cost basis method cannot be changed after settlement.

### **Risk of Investment Loss**

#### ***Risk of Loss***

Investing in securities involves risk of loss that you should be prepared to bear. We do not represent or guarantee that our services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines.

We cannot offer any guarantees or promises that your financial goals and objectives will be met.

Past performance is in no way an indication of future performance.

### ***Other Risk Considerations***

When evaluating risk, financial loss may be viewed differently by each client and may depend on many different risks, each of which may affect the probability and magnitude of any potential losses. The following risks may not be all-inclusive but should be considered carefully by a prospective client before retaining our services.

***Liquidity Risk:*** The risk of being unable to sell your investment at a fair price at a given time due to high volatility or lack of active liquid markets. You may receive a lower price or it may not be possible to sell the investment at all.

***Credit Risk:*** Credit risk typically applies to debt investments such as corporate, municipal, and sovereign fixed income or bonds. A bond issuing entity can experience a credit event that could impair or erase the value of an issuer's securities held by a client.

***Inflation and Interest Rate Risk:*** Security prices and portfolio returns will likely vary in response to changes in inflation and interest rates. Inflation causes the value of future dollars to be worth less and may reduce the purchasing power of a client's future interest payments and principal. Inflation also generally leads to higher interest rates which may cause the value of many types of fixed income investments to decline.

***Horizon and Longevity Risk:*** The risk that your investment horizon is shortened because

of an unforeseen event, for example, the loss of your job. This may force you to sell investments that you were expecting to hold for the long term. If you must sell at a time that the markets are down, you may lose money. Longevity Risk is the risk of outliving your savings. This risk is particularly relevant for people who are retired or are nearing retirement.

**Selection of Other Advisers.** Peace of Mind Planning, LLC's selection process cannot ensure that money managers will perform as desired and Peace of Mind Planning, LLC will have no control over the day-to-day operations of any of its selected money managers. Peace of Mind Planning, LLC would not necessarily be aware of certain activities at the underlying money manager level, including without limitation a money manager's engaging in unreported risks, investment "style drift" or even regulatory breaches or fraud.

**Legal or Legislative Risk.** Legislative changes or court rulings may impact the value of investments or the securities' claim on the issuer's assets and finance.

**Pandemic Risk.** The recent COVID-19 pandemic has caused and continues to cause disruptions in economies and individual companies and volatility in financial markets throughout the world, including those in which Firm Clients ("Clients") invest. The impact of the pandemic and resulting economic disruptions may negatively impact the Clients and the performance of their portfolios due to, among other things, (i) interruption of business operations resulting from travel restrictions, reduced consumer spending, and quarantines of employees, customers and suppliers in areas affected by the outbreak, (ii) closures of manufacturing facilities, warehouses and logistics supply chains, and (iii) uncertainty about the duration of the virus' impact on global financial markets. Governments and central banks throughout the world have responded to the pandemic and resulting economic disruptions with a variety of fiscal and monetary policy changes, including direct capital infusions into companies and other issuers, new monetary policy tools and lower interest rates, but the ultimate impact of these efforts is uncertain. It is not possible to determine the duration or severity of the disruption in financial markets or the long-term economic impact of the COVID-19 pandemic, or other future epidemics or pandemics, which may adversely affect the Clients' performance and investment strategies and significantly reduce available investment opportunities.

## **Item 9 Disciplinary Information**

We are required to disclose the facts of any legal or disciplinary events that are material to a client's evaluation of our advisory business or the integrity of our management.

Neither the Firm nor its management persons have been the subject to any criminal or civil actions, administrative proceedings, or self-regulatory organization (SRO) proceedings. Clients and prospective clients can view the CRD records (registration records) through the SEC's Investment Adviser Public Disclosure (IAPD) website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 10 Other Financial Industry Activities and Affiliations**

### **Synergy Financial Services, Inc. Family of Companies**

Peace of Mind Planning is principally owned by Synergy Financial Services, Inc., a Washington state licensed Insurance Producer. Peace of Mind Planning representatives may recommend insurance products to clients based on the Firm's financial planning process. Recommendations to purchase commission-based insurance products presents a conflict of interest, as the recommendation could be

made on the basis of commission compensation to be received, rather than a client's best interest.

Synergy Financial Services, Inc. is also the principal owner of Synergy Asset Management, LLC, a registered investment adviser. Peace of Mind Planning, LLC may engage or recommend the services of Synergy Asset Management, LLC as a third-party investment manager and/or sub-adviser for Peace of Mind Planning, LLC clients. Peace of Mind Planning, LLC is paid an asset-based fee for its Portfolio Management and Selection of Other Advisers services, and a portion of this total fee is retained by the engaged third-party adviser. Recommendations from Peace of Mind Planning to utilize SAM for third-party management and/or sub-advisory services, therefore, presents a conflict of interest, as the recommendation could be made on the basis of compensation to be received by Peace of Mind Planning's affiliate, rather than a client's best interest.

Synergy Financial Services, Inc. is also the principal owner of Rowan Street Advisors, LLC ("Rowan") and a principal owner of Crosslink Capital Group, LLC ("Crosslink"), each a registered investment adviser. Rowan serves as the Managing Member of the Rowan Street Capital, LLC private fund. Crosslink is the investment manager of the Crosslink Capital Fund I, LLC private fund. Depending on the client's individual circumstances, we may recommend investment in one or more of these private funds. Because affiliates of Peace of Mind Planning serve as investment managers and Managing Members of the private funds, they are entitled to receive a fund management fee and may be eligible to receive a performance-based fee or allocation. This creates a conflict of interest because we have an incentive to recommend an investment in the private fund based on the potential for increased compensation to Peace of Mind Planning's affiliates, rather than solely based on the interest of our clients.

Synergy Financial is also the parent company of Synergy Business Valuations & Consulting, LLC, a Washington corporation, which offers business valuation services to individuals and entities; and Synergy Mergers and Acquisitions, LLC (dba Synergy), a Washington corporation, which offers real estate brokerage services to individuals and entities. Recommendations to use the services of Synergy Business Valuations & Consulting, LLC and/or Synergy Mergers and Acquisitions, LLC (dba Synergy) present conflicts of interest, as the recommendations could be made on the basis of additional compensation to be received by Peace of Mind Planning's affiliates.

Notwithstanding the conflicts of interest described above, Peace of Mind will always act in the best interests of the client, including when recommending additional service providers. Clients are in no way required to engage the services of any entity recommended by Peace of Mind Planning and may choose to implement Peace of Mind Planning recommendations through the service provider(s) of the client's choosing.

### **Registration with Broker-Dealer**

Neither Peace of Mind Planning, LLC nor its representatives are registered as, or have pending applications to become, a broker-dealer or a representative of a broker-dealer.

### **Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor**

Neither Peace of Mind Planning, LLC nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

### **Independent Insurance Representative**

Schadler Financial, LLC is licensed as an insurance firm. Blair Schadler is, in his individual capacity, a

licensed insurance agent of Schadler Financial, LLC. Mr. Schadler wholly owns Schadler Financial, LLC and will earn commission-based compensation for selling insurance products, including insurance products they sell to you. Insurance commissions earned by Mr. Schadler are separate from our advisory fees.

Clients should be aware that these services pay a commission, which creates a conflict of interest, as insurance recommendations could be made on the basis of commission compensation to be received, rather than a client's best interest. Peace of Mind Planning, LLC always acts in the best interest of the client including in the sale of commissionable products to advisory clients. Clients are in no way required to purchase insurance products through Mr. Schadler in his capacity as an insurance agent or through Schadler Financial, LLC in its capacity as a licensed insurance agency.

Peace of Mind Planning, LLC always acts in the best interest of the client and clients are in no way required to accept the services of any representative of Peace of Mind Planning, LLC in connection with such individual's activities outside of Peace of Mind Planning, LLC.

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

### **Description of Our Code of Ethics**

We strive to comply with applicable laws and regulations governing our practices. Therefore, our Code of Ethics includes guidelines for professional standards of conduct for persons associated with our firm. Our goal is to protect your interests at all times and to demonstrate our commitment to our fiduciary duties of honesty, good faith, and fair dealing with you. All persons associated with our firm are expected to adhere strictly to these guidelines. Persons associated with our firm are also required to report any violations of our Code of Ethics. Additionally, we maintain and enforce written policies reasonably designed to prevent the misuse or dissemination of material, non-public information about you or your account holdings by persons associated with our firm.

Clients or prospective clients may obtain a copy of our Code of Ethics by contacting us at the telephone number on the cover page of this brochure.

### **Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest**

Peace of Mind Planning, LLC does not engage in principal trading (i.e., the practice of selling stock to advisory clients from a firm's inventory or buying stocks from advisory clients into a firm's inventory). In addition, Peace of Mind Planning, LLC does not recommend any securities to advisory clients in which it has some proprietary or ownership interest, nor does Peace of Mind Planning, LLC or its related persons recommend or transact in any securities for advisory clients in which they have a material financial interest.

### **Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest**

Peace of Mind Planning, LLC, its affiliates, employees and their families, trusts, estates, charitable organizations and retirement plans established by it may purchase the same securities as are purchased for clients in accordance with its Code of Ethics policies and procedures. The personal securities transactions by advisory representatives and employees may raise potential conflicts of interest when they trade in a security that is:

- owned by the client, or
- considered for purchase or sale for the client.

Such conflict generally refers to the practice of front-running (trading ahead of the client), which Peace of Mind Planning, LLC specifically prohibits. Peace of Mind Planning, LLC has adopted policies and procedures that are intended to address these conflicts of interest. These policies and procedures:

- require our advisory representatives and employees to act in the client's best interest
- prohibit fraudulent conduct in connection with the trading of securities in a client account
- prohibit employees from personally benefitting by causing a client to act, or fail to act in making investment decisions
- prohibit the firm or its employees from profiting or causing others to profit on knowledge of completed or contemplated client transactions
- allocate investment opportunities in a fair and equitable manner
- provide for the review of transactions to discover and correct any trades that result in an advisory representative or employee benefitting at the expense of a client.

Advisory representatives and employees must follow Peace of Mind Planning, LLC's procedures when purchasing or selling the same securities purchased or sold for the client.

### **Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest**

Peace of Mind Planning, LLC, its affiliates, employees and their families, trusts, estates, charitable organizations, and retirement plans established by it may effect securities transactions for their own accounts that differ from those recommended or effected for other Peace of Mind Planning, LLC clients. Peace of Mind Planning, LLC will make a reasonable attempt to trade securities in client accounts at or prior to trading the securities in its affiliate, corporate, employee or employee-related accounts. Trades executed the same day will likely be subject to an average pricing calculation. It is the policy of Peace of Mind Planning, LLC to place the clients' interests above those of Peace of Mind Planning, LLC and its employees.

### **Personal Trading Practices**

Our firm or persons associated with our firm may buy or sell the same securities that we recommend to you or securities in which you are already invested. A conflict of interest exists in such cases because we have the ability to trade ahead of you and potentially receive more favorable prices than you will receive. To mitigate this conflict of interest, it is our policy that neither our firm nor persons associated with our firm shall have priority over your account in the purchase or sale of securities.

## **Item 12 Brokerage Practices**

### **Factors Used to Select Broker-Dealers for Client Transactions**

#### ***Custodian Recommendations***

Peace of Mind Planning, LLC, portfolio management services are offered through (a) third-party sub-adviser(s) on a sub-advised basis. Accordingly, Peace of Mind Planning, LLC generally does not recommend, request, or require the use of any particular broker-dealer. Clients who elect to receive portfolio management services must be willing to accept the brokerage practices of the underlying sub-adviser(s), details of which will be disclosed in such third-party sub-adviser's disclosure brochure.

#### ***Soft Dollar Arrangements***

Peace of Mind Planning, LLC, does not utilize soft dollar arrangements. Peace of Mind Planning, LLC, does not direct brokerage transactions to executing brokers for research and brokerage services.

### **Brokerage for Client Referrals**

Peace of Mind Planning, LLC, does not engage in the practice of directing brokerage commissions in exchange for the referral of advisory clients.

### **Directed Brokerage**

Peace of Mind Planning, LLC generally does not accept directed brokerage arrangements. If a directed brokerage arrangement is accepted, the client must be willing to accept that Peace of Mind Planning, LLC, and/or any engaged sub-adviser(s), may not be able to achieve the most favorable execution of client transactions. Directed brokerage arrangements, therefore, may cost the client more money.

### **Aggregating Securities Transactions for Client Accounts**

We typically do not aggregate securities transactions for client accounts as part of our portfolio management services. However, details concerning aggregating securities transactions for client accounts held with third-party sub-advisors will be disclosed in the third-party sub-adviser's disclosure brochure.

## **Item 13 Reviews of Accounts**

Accounts are reviewed by the account's advisor and random accounts are reviewed by Peace of Mind Planning, LLC's Chief Compliance Officer, Blair Schadler, or designee. The frequency of reviews is determined based on the client's investment objectives, but adviser reviews are generally conducted no less frequently than quarterly. Clients may request restrictions, guidelines or limitations concerning their advisory agreement subject to practicality of the Firm management.

More frequent reviews may also be triggered by a change in the client's investment objectives, tax considerations, large deposits or withdrawals, large purchases or sales, loss of confidence in the underlying investment, or changes in macro-economic climate.

### **Review of Client Accounts on Non-Periodic Basis**

Peace of Mind Planning, LLC may perform ad hoc reviews on an as-needed basis if there have been material changes in the client's investment objectives or risk tolerance, or a material change in how Peace of Mind Planning, LLC formulates investment advice.

### **Content of Client-Provided Reports and Frequency**

Each client of Peace of Mind Planning, LLC's advisory services provided on an ongoing basis will receive a quarterly report detailing the client's account, including assets held, asset value, and calculation of fees. This written report will come from the custodian.

## **Item 14 Client Referrals and Other Compensation**

### **Economic Benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest**

#### **Insurance**

As disclosed under the Fees and Compensation section in this brochure, persons providing investment advice on behalf of our firm are licensed insurance agents. For information on the conflicts of interest this presents, and how we address these conflicts, refer to the *Fees and Compensation* section.

#### **Advisory Firm Payments for Client Referrals**

Peace of Mind Planning, LLC does not pay for client referrals, nor does Peace of Mind Planning, LLC receive any economic benefits from a party other than the client for the advisory services we provide to



clients.

## **Item 15 Custody**

For portfolio management services, to the extent authorized by the client, the engaged third-party manager is generally responsible for deducting Peace of Mind Planning, LLC's fee from the client account and remitting Peace of Mind Planning, LLC's portion of the total fee to the firm. In such instances, clients will receive at least quarterly account statements directly from their custodian containing a description of all activity, cash balances and portfolio holdings in the client's account, and clients are urged to review these statements carefully. Clients are also urged to compare billing statements provided by the third-party managers, to the extent applicable, to the custodian statement for accuracy. Any discrepancies should be brought to the firm's attention. The custodian's statement is the official record of the account. Please refer to the applicable investment manager's disclosure brochure for detailed information on custody.

## **Item 16 Investment Discretion**

Subject to the terms of its investment advisory agreement, Peace of Mind Planning, LLC may be granted discretionary authority for account management and/or the retention of independent third-party sub-advisers. Investment limitations may be designated by the client as outlined in the investment advisory agreement. Please see the applicable third-party sub-adviser's disclosure brochure for detailed information relating to discretionary authority. When engaged on a non-discretionary basis, Peace of Mind Planning, LLC will properly secure the client's permission prior to effecting securities transactions in the client's account(s).

## **Item 17 Voting Client Securities**

Peace of Mind Planning, LLC will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security. We do not determine if securities held by you are the subject of a class action lawsuit or whether you are eligible to participate in class action settlements or litigation nor do we initiate or participate in litigation to recover damages on your behalf for injuries as a result of actions, misconduct, or negligence by issuers of securities held by you. Contact our main office at the telephone number on the cover page of this brochure if you have any questions.

## **Item 18 Financial Information**

The Firm does not have any financial condition or impairment that would prevent us from meeting our contractual commitments to you. We do not take physical custody of client funds or securities, or serve as trustee or signatory for client accounts, and we do not require the prepayment of more than \$500 in fees six or more months in advance. Therefore, we are not required to include a financial statement with this brochure.

The Firm has not filed a bankruptcy petition at any time in the past ten years.

Our Firm, under Michigan state requirements, maintains a positive net worth of \$10,000 where it has discretionary authority for client accounts. Our Firm will, at all times, maintain such net worth and therefore is not mandated to obtain a surety bond.

## **Item 19 Requirements for State Registered Advisers**

### **Principal Executive Officers and Management Persons**

Mr. Schadler is the Firm's Chief Compliance Officer. Education and business background information are included in the Brochure Supplement provided with this Brochure.

Joseph Maas is the Firm's other "management person." Mr. Maas received a Bachelor of Arts – Finance, from Seattle Pacific University in 1990 and Master of Science – Financial Services from American College in 2000. He is the Founder and Managing Member of Synergy Asset Management, LLC.

### **Outside Business Activities Engaged In**

Our Firm is not actively engaged in any business other than giving investment advice that is not already disclosed above. Firm representatives do act as insurance agents and, as such, will solicit insurance products where appropriate.

### **Performance-Based Fee Description**

Neither our firm, nor any persons associated with our firm are compensated for advisory services with performance-based fees. Refer to the Performance-Based Fees and Side-By-Side Management section above for additional information on this topic.

### **Disclosure of Material Facts Related to Arbitration or Disciplinary Actions Involving Management Persons**

Neither Peace of Mind Planning, LLC, nor any of its management persons, have been involved in an award or found liable in an arbitration claim alleging damages in excess of \$2,500, nor have they found liable in any civil, self-regulatory organization, or administrative proceeding. Prospective clients can view the CRD records (registration records) for through the SEC's Investment Adviser Public Disclosure (IAPD) website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

### **Material Relationships Maintained by this Advisory Business or Management Persons with Issuers of Securities**

Neither our Firm, nor any of our management persons have a material relationship or arrangement with any issuer of securities.

## **Item 20 Additional Information**

### **Your Privacy**

Peace of Mind Planning LLC views protecting your private information as a top priority. Pursuant to applicable privacy requirements, we have instituted policies and procedures to ensure that we keep your personal information private and secure.

The Firm does not disclose any non-public personal information about you to any non-affiliated third parties, except as permitted by law. In the course of servicing your account, we may share some information with our service providers, such as transfer agents, custodians, broker-dealers, accountants, consultants, and attorneys.

We restrict internal access to non-public personal information about you to employees, who need that information in order to provide products or services to you. We maintain physical and procedural safeguards that comply with regulatory standards to guard your non-public personal information and to ensure our integrity and confidentiality. We will not sell information about you or your accounts to anyone. We do not share your information unless it is required to process a transaction, at your request, or required by law.

You will receive a copy of our privacy notice prior to or at the time you sign an advisory agreement with our firm. Thereafter, we will deliver a copy of the current privacy policy notice to you on an annual basis. Contact our main office at the telephone number on the cover page of this brochure if you have any questions regarding this policy.

If you decide to close your account(s) we will adhere to our privacy policies, which may be amended from time to time.

If we make any substantive changes in our privacy policy that would further permit or require disclosures of your private information, we will provide written notice to you. Where the change is based on permitted disclosures, you will be given an opportunity to direct us as to whether such disclosure is acceptable. Where the change is based on required disclosures, you will only receive written notice of the change. You may not opt out of the required disclosures.

If you have questions about our privacy policies contact our main office at the telephone number on the cover page of this brochure and ask to speak to the Chief Compliance Officer.