# Item 1 – Cover Page

**O’Neill Financial Planning LLC**

Registered Investment Advisor

O’Neill Financial Planning LLC

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Estero, FL 33967

(630) 248-6401

www.oneillfinancialplanning.com

Form ADV Part 2A

Firm Brochure

January 11, 2018

This brochure provides information about the qualifications and business practices of O’Neill Financial Planning LLC. If you have any questions about the content of this brochure, please contact Paul O’Neill at (630) 248-6401.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or any state securities administrator. Additional information about O’Neill Financial Planning LLC is available on the SEC’s website at www.adviserinfo.sec.gov. Click on the “Investment Adviser Search” link and then search for “Investment Adviser Firm” using the firm’s IARD (“CRD”) number, which is 282870.

While the firm and its associates may be registered and/or licensed within a particular jurisdiction, that registration and/or licensing in itself does not imply an endorsement by any regulatory authority, nor does it imply a certain level of skill or training on the part of the firm or its associated personnel.

# Item 2 – Material Changes

There are no material changes to disclose since the prior filing of this document. For future filings, this section of the brochure may address only those material changes that have occurred since the firm’s last annual update.

The firm may at any time update this document and either send a copy of its updated brochure or provide a summary of material changes to its brochure and an offer to send an electronic or hard copy form of the updated brochure. Clients are also able to download this brochure from the SEC’s website at www.adviserinfo.sec.gov or may contact our firm at (630) 248-6401 to request a copy at any time.

As with all firm documents, clients and prospective clients are encouraged to review this brochure in its entirety and are encouraged to ask questions at any time prior to or throughout the engagement.

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***Important Information***

Throughout this document O’Neill Financial Planning LLC may also be referred to as “the firm,” “firm,” “our,” “we” or “us.” The client or prospective client may be also referred to as “you,” “your,” etc., and refers to a client engagement involving a single *person* as well as two or more *persons*, and may refer to natural persons and legal entities. In addition, the term “advisor” and “adviser” are used interchangeably where accuracy in identification is necessary (i.e., internet address, etc.).

Our firm maintains a business continuity and succession contingency plan that is integrated within the organization to ensure it appropriately responds to events that pose a significant disruption to its operations. A statement concerning the current plan is available under separate cover.

# Item 4 - Advisory Business

***Description of the Firm***

O’Neill Financial Planning LLC is a Florida domiciled limited liability company formed in January of 2016. Our firm is not a subsidiary of nor does it control another financial services industry entity. In addition to our 2016 registration as an investment advisor in Florida, our firm and its associates may register, become licensed or meet certain exemptions to registration and/or licensing in other jurisdictions in which investment advisory business is conducted.

Paul E. O’Neill, CFP® is the firm’s Principal and Chief Compliance Officer (supervisor).[[1]](#footnote-1) He is also Managing Member and maintains controlling interest in the firm. Additional information about Paul O’Neill and his background may be found toward the end of this brochure.

***Description of Advisory Services Offered***

The firm’s financial planning services provide clients with advice on key topics such as cash flow and budgeting, funding a college education, retirement planning, risk management, estate or tax planning, investment consultation, among others.

An initial complimentary interview is conducted by a representative of our firm to discuss your current situation, goals and the scope of services that may be provided to you. During or prior to this meeting you will be provided with this Form ADV Part 2 firm brochure that includes a statement involving our privacy policy, as well as a brochure supplement about the representative who will be assisting you. We will also ensure that any material conflicts of interest have been disclosed to you that could be reasonably expected to impair the rendering of unbiased and objective advice.

Should you wish to engage O’Neill Financial Planning LLC for its services, you must first execute our client engagement agreement. Thereafter discussion and analysis will be conducted to determine your financial needs, goals, holdings, etc. Depending on the scope of the engagement, you may be asked to provide copies of the following documents early in the process:

* Wills, codicils and trusts
  + Insurance policies
  + Mortgage information
  + Student loan data
  + Tax returns
  + Current financial specifics including W-2s or 1099s
  + Information on current retirement plans and benefits provided by your employer
  + Statements reflecting current investments in retirement and non-retirement accounts
  + Employment or other business agreements you may have in place
  + Completed risk profile questionnaires or other forms provided by our firm

It is important that we are provided with an adequate level of information and supporting documentation throughout the term of the engagement including but not limited to: source of funds, income levels, and an account holder or attorney-in-fact’s authority to act on behalf of the account, among other information that may be necessary for our services.

The information and/or financial statements provided to us need to be accurate. Our firm may, but is not obligated to, verify the information that you have provided to us which will then be used in the advisory process.

It is essential that you inform our firm of significant issues that may call for an update to their plan. Events such as changes in employment or marital status, an unplanned windfall, etc., can have an impact on your circumstances and plans. Our firm needs to be aware of such events so that adjustments may be made as necessary.

***Financial Planning Services***

Financial planning services may be as broad-based or narrowly focused as you desire. The incorporation of most or all of the listed components allows not only a thorough analysis but also a refined focus of your plans so that the firm is able to assist you in reaching your goals and objectives.

*Cash Flow Analysis and Debt Management*

A review of your income and expenses will be conducted to determine your current surplus or deficit. Based upon the results, we will provide advice on prioritizing how any surplus should be used, or how to reduce expenses if they exceed your income. In addition, advice on the prioritization of which debts to repay may be provided, based upon such factors as the debt’s interest rate and any income tax ramifications. Recommendations may also be made regarding the appropriate level of cash reserves for emergencies and other financial goals. These recommendations are based upon a review of cash accounts (such as money market funds) for such reserves and may include strategies to save desired reserve amounts.

*Risk Management*

A risk management review includes an analysis of your exposure to major risks that could have a significant adverse impact on your financial picture, such as premature death, disability, property and casualty losses, or the need for long-term care planning. Advice may be provided on ways to minimize such risks and about weighing the costs of purchasing insurance versus the benefits of doing so and, likewise, the potential cost of not purchasing insurance (“self-insuring”).

*Employee Benefits*

A review is conducted and analysis is made as to whether you, as an employee, are taking maximum advantage of your employee benefits. We will also offer advice on your employer-sponsored retirement plan and/or stock options, along with other benefits that may be available to you.

*Personal Retirement Planning*

Retirement planning services typically include projections of your likelihood of achieving your financial goals, with financial independence usually the primary objective. For situations where projections show less than the desired results, a recommendation may include showing you the impact on those projections by making changes in certain variables (i.e., working longer, saving more, spending less, taking more risk with investments). If you are near retirement or already retired, advice may be given on appropriate distribution strategies to minimize the likelihood of running out of money or having to adversely alter spending during your retirement years.

*College Funding*

Advice involving college funding may include projecting the amount that will be needed to achieve post-secondary education funding goals, along with savings strategies and the “pros-and-cons” of various college savings vehicles that are available. We are also available to review your financial picture as it relates to eligibility for financial aid or the best way to contribute to family members, such as grandchildren, if appropriate.

*Tax Planning Strategies*

Advice may include ways to minimize current and future income taxes as a part of your overall financial planning picture. For example, recommendations may be offered as to which type of account(s) or specific investments should be owned based in part on their “tax efficiency,” with consideration that there is always a possibility of future changes to federal, state or local tax laws and rates that may impact your situation.

*Estate Planning*

Our review typically includes an analysis of your exposure to estate taxes and your current estate plan, which may include whether you have a will, powers of attorney, trusts and other related documents. We may assess ways to minimize or avoid future estate taxes by implementing appropriate estate planning strategies such as the use of applicable trusts. We generally recommend that you consult with a qualified attorney when you initiate, update, or complete estate planning activities. We may provide you with contact information for attorneys who specialize in estate planning when you wish to hire an attorney for such purposes. From time-to-time, we will participate in meetings or phone calls between you and your attorney with your prior approval.

*Divorce Planning*

Separation or divorce can have a major impact on your goals and plans. We will work with you to help you gain an understanding of your unique situation and provide you with a realistic financial picture so that you are in a better situation to communicate with legal counsel, a mediator or soon to be ex-spouse. We can assist in the completion of cash flow and net worth projections, budget analysis, as well as help you to understand what the financial consequences and/or benefits are involving a settlement.

*Investment Consultation*

Investment consultation services often involve providing information on the types of investment vehicles available, employee retirement plans and/or stock options, investment analysis and strategies, asset selection and portfolio design, as well as limited assistance if your investment account is maintained at another broker/dealer or custodian. The strategies and types of investments that may be recommended are further discussed in Item 8 of this brochure.

*Broad-Based v. Modular Financial Planning*

A broad-based plan is an endeavor that requires detail. Certain variables can affect the cost involved in the development of the plan, such as the quality of your own records, complexity and number of current investments, diversity of insurance products and employee benefits you currently hold, size of the potential estate, and special needs of the client or their dependents, among others. While certain broad-based plans may require 10 or more hours to complete, complex plans may require more than 20 hours.

At your request we may concentrate on reviewing only a specific area (modular planning), such as an employer retirement plan allocation, funding an education or estate planning issues, or evaluating the sufficiency of your current retirement plan. Note that when these services focus only on certain areas of your interest or need, your overall situation or needs may not be fully addressed due to limitations you may have established.

Whether we have created a broad-based or modular plan, we will present you with a summary of our recommendations, guide you in the implementation of some or all of them per your decision, as well as offer you periodic reviews thereafter. In all instances involving our financial planning engagements, our clients retain full discretion over all implementation decisions and are free to accept or reject any recommendation we make.

***Wrap Fee Programs***

Our firm does not sponsor or serve as a portfolio manager in an investment program involving wrapped (bundled) fees.

***Client Assets Under Management***

Due to the nature of our advisory services, we do not have reportable client assets under management.[[2]](#footnote-2)

# Item 5 - Fees and Compensation

Forms of payment are based on the types of services being provided, term of service, etc., and will be stated in your engagement agreement with our firm. Our payment requests for our fees will be preceded by our invoice. Fees are to be paid by check or draft from US-based financial institutions and, with your prior authorization, payment may also be made through a qualified, unaffiliated PCI compliant[[3]](#footnote-3) third-party processor. Our firm does not accept cash, money orders or similar forms of payment for its engagements, nor do we withdraw our fee from your investment account held at your custodian of record.

Clients are assessed hourly fee at the rate of $240 per hour. We bill in 20-minute increments, and a partial increment (e.g., seven minutes) will be treated as a whole increment. Prior to entering into an agreement with our firm you will receive an estimate of the overall cost based on your requirements and the time involved. We do not require a deposit; our fee will be due upon delivery of our invoice which coincides with the presentation of your plan.

At the sole discretion of the firm principal, fees may be reduced or waived for associates of the firm, family members, or pre-existing relationships.

Any transactional or service fees (sometimes termed *brokerage fees*), individual retirement account fees, qualified retirement plan fees, account termination fees, or wire transfer fees will be borne by the account holder per your custodian’s fee schedule. Fees paid by our clients to our firm for our advisory services are separate from any of these fees or other similar charges. In addition, advisory fees paid to our firm for its services are separate from any internal fees or charges a client may pay involving mutual funds, exchange-traded funds (ETFs), exchange-traded notes (ETNs) or other similar investments.

Per annum interest at the current statutory rate based on the state in which the client resides may be assessed on fee balances due more than 30 days, and we may refer past due accounts to collections or legal counsel for processing. We reserve the right to suspend some or all services once an account is deemed past due.

Additional information about our fees in relationship to our operational practices are noted in Items 12 and 14 of this document.

Our firm does not charge or receive a commission or a mark-up on securities transactions, nor will we be paid a commission on a client’s purchase of a securities holding or insurance contract that is recommended to them. We do not receive “trailer” or SEC Rule 12b-1 fees from an investment company that may be recommended to a client. Fees charged by such issuers are detailed in prospectuses or product descriptions and we encourage our clients to read these documents before investing. Each client retains the right to purchase recommended or similar investments through the service provider of their choice.

Either party may terminate the agreement at any time by communicating the intent to terminate in writing. If you verbally notify our firm of the termination and, if in two business days following this notification we have not received your notice in writing, we will make a written notice of the termination in our records and send you our own termination notice as a substitute. Our firm will not be responsible for future investment allocation or planning advice upon our receipt of a termination notice.

If a client did not receive our Form ADV Part 2 firm brochure at least 48 hours prior to entering into the firm’s agreement, then that client will have the right to terminate the engagement without fee or penalty within five business days after entering into the agreement. Should a client terminate an engagement after this five-day time period, the client will be assessed fees at our current hourly rate for any time incurred in the preparation of a client’s analysis or plan.

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

Our firm’s advisory fees will not be based on a share of capital gains or capital appreciation (growth) of any portion of managed funds, also known as performance-based fees. Our fees will also not be based on side-by-side management, which refers to a firm simultaneously managing accounts that do pay performance-based fees (such as a hedge fund) and those that do not.

# Item 7 - Types of Clients

We provide our services to individuals and high net worth individuals of all investment experience. We do not require minimum income, minimum asset levels or other similar preconditions for our engagements.

We reserve the right to waive or reduce certain fees based on unique individual circumstances, special arrangements or preexisting relationships. Our firm reserves the right to decline services to any prospective client for any nondiscriminatory reason.

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

***Methods of Analysis***

Our firm employs fundamental analyses; we evaluate various economic factors including interest rates, the current state of the economy, or the future growth of an industry sector. Our research may be drawn from a range of sources that include economists and other industry professionals, financial periodicals and reference materials, annual reports and regulatory filings, as well as corporate rating services.

***Investment Strategies***

Client portfolios are constructed based on Modern Portfolio Theory or Core + Satellite strategies.

Modern Portfolio Theory states that by employing securities whose price movements have historically low correlations, it is possible to create an efficient portfolio that can offer the highest expected return for a given level of risk, or one with the lowest level of risk for a given expected return. The practice of Modern Portfolio Theory does not employ market timing or stock selection methods of investing but rather a long term, buy-and-hold strategy with periodic rebalancing of the account to maintain desired risk levels.

Core + Satellite blends passive (or index) and active investing, where passive investments are used as the basis or “core” of a portfolio and actively-managed investments are added as “satellite” positions. The portfolio core holdings are indexed to potentially more efficient asset classes, while outlying selections are generally limited to active holdings in an attempt to outperform a particular category (sector), or a selection of particular positions to increase core diversification, or to improve portfolio performance.

We typically recommend portfolios that contain investment vehicles that are considered diversified, tax-efficient and low-cost whenever practical. We generally recommend a broad range of mutual funds, to include indexed mutual funds.

***Risk of Loss***

Our firm believes its strategies and investment recommendations are designed to produce the appropriate potential return for the given level of risk; however, there is no guarantee that an investment objective will be achieved. Investing in securities involves risk of loss that clients should be prepared to bear. We have offered examples of such risk in the following paragraphs, and we believe it is important that our clients review and consider each of them risk prior to investing.

*Company Risk*

When investing in securities, such as stocks, there is always a certain level of company or industry-specific risk that is inherent in each company or issuer.  There is the risk that the company will perform poorly or have its value reduced based on factors specific to the company or its industry. This is also referred to as *unsystematic risk* and can be reduced or mitigated through diversification.

*Core + Satellite Strategies*

Strategies involving Core + Satellite investing may have the potential to be affected by “active risk” (or “tracking error risk”), which might be defined as a deviation from a stated benchmark. Since the core portfolio attempts to closely replicate a stated benchmark, the source of the tracking error or deviation may come from a satellite portfolio or position, or from a “sample” or “optimized” index fund or ETF that may not as closely align the stated benchmark.

*Failure to Implement*

As a financial planning client, you are free to accept or reject any or all of the recommendations made to you. While no advisory firm can guarantee future performance, no plan can succeed if it is not implemented. Clients who choose not to take the steps recommended in their financial plan may face an increased risk that their stated goals and objectives will not be achieved.

*Financial Risk*

Excessive borrowing to finance a business operation increases profitability risk because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

*Fundamental Analysis*

The challenge involving fundamental analyses is that information obtained may be incorrect; the analysis may not provide an accurate estimate of earnings, which may be the basis for a security’s value.

If a security’s price adjusts rapidly to new information, a fundamental analysis may result in unfavorable performance.

*Inflation Risk*

When any type of inflation is present, a dollar today will not buy as much as a dollar next year because purchasing power is eroding at the rate of inflation.

*Market Risk*

When the stock market as a whole or an industry as a whole falls, it can cause the prices of individual stocks to fall indiscriminately. This is also called *systemic* or *systematic* risk.

*Mutual Funds*

The risk of owning mutual funds reflect their underlying securities (e.g., stocks, bonds, securities futures, etc.). These forms of securities typically carry additional expenses based on their share of operating expenses and certain brokerage fees, which may result in the potential duplication of certain fees. Indexed funds have the potential to be affected by “active risk” (or “tracking error risk”); a deviation from a stated benchmark (e.g., S&P 500).

*Passive Markets Theory*

A portfolio that employs a passive, efficient markets approach has the risk of generating lower-than-expected returns due to its broad diversification when compared to a portfolio more narrowly focused.

*Political Risk*

The risk of financial and market loss because of political decisions or disruptions in a particular country or region, and may also be known as geopolitical risk.

*QDI Ratios*

While various investment holdings may be known for their potential tax-efficiency and higher “qualified dividend income” (QDI) percentages, there are asset classes within these investment vehicles or holding periods within that may not benefit. Shorter holding periods, as well as commodities and currencies (that may be a holding within a mutual fund), may be considered “non-qualified” under certain tax code provisions. A holding’s QDI will be considered when tax-efficiency is an important aspect of the client’s portfolio.

*Research Data*

When research and analyses are based on commercially available software, rating services, general market and financial information, a firm is relying on the accuracy and validity of the information or capabilities provided by selected vendors, rating services, market data, and the issuers themselves. While our firm makes every effort to determine the accuracy of the information received, we cannot predict the outcome of events or actions taken or not taken, or the validity of all information researched or provided which may or may not affect the advice on or investment management of an account.

# Item 9 - Disciplinary Information

Neither the firm nor its management has been involved in a material criminal or civil action in a domestic, foreign or military jurisdiction, an administrative enforcement action, or self-regulatory organization proceeding that would reflect poorly upon our offering advisory business or its integrity.

# Item 10 - Other Financial Industry Activities and Affiliations

Firm policies require associated persons to conduct business activities in a manner that avoids conflicts of interest between the firm and its clients, or that may be contrary to law. We will provide disclosure to each client prior to and throughout the term of an engagement regarding any conflicts of interest involving its business relationships that might reasonably compromise its impartiality or independence.

Our advisory firm and its management are not registered nor have an application pending to register as a Financial Industry Regulatory Authority (FINRA) or National Futures Association (NFA) member firm or associated person of such a firm, nor are we required to be registered with such entities. Neither our firm nor its management is or has a material relationship with any of the following types of entities:

* accounting firm or accountant
* another investment advisor, including financial planning firms, municipal advisors or third-party investment managers
* bank, credit union or thrift institution, or their separately identifiable departments or divisions
* insurance company or agency
* lawyer or law firm
* pension consultant
* real estate broker or dealer
* sponsor or syndicator of limited partnerships
* trust company
* issuer of a security, to include 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)

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

O’Neill Financial Planning LLC holds itself to a *fiduciary standard*, which means the firm and its associates will act in the utmost good faith, performing in a manner believed to be in the best interest of its clients. Our firm believes that business methodologies, ethics rules, and adopted policies are designed to eliminate or at least minimize material conflicts of interest and to appropriately manage any material conflicts of interest that may remain. You should be aware that no set of rules can possibly anticipate or relieve all material conflicts of interest. Our firm will disclose to its advisory clients any material conflict of interest relating to the firm, its representatives, or any of its employees which could reasonably be expected to impair the rendering of unbiased and objective advice.

***Code of Ethics Description***

We have adopted a Code of Ethics that establishes policies for ethical conduct for our personnel. Our firm accepts the obligation not only to comply with applicable laws and regulations but also to act in an ethical and professionally responsible manner in all professional services and activities. Firm policies include prohibitions against insider trading, circulation of industry rumors, and certain political contributions, among others. Our firm periodically reviews and amends its Code of Ethics to ensure that it remains current, and requires firm personnel to annually attest to their understanding of and adherence to the firm’s Code of Ethics. A copy of the firm’s Code of Ethics is made available to any client or prospective client upon request.

***Statement regarding our Privacy Policy***

We respect the privacy of all clients and prospective clients (collectively termed “customers” per regulation), both past and present. It is recognized that you have entrusted our firm with non-public personal information and it is important that both access persons and customers are aware of firm policy concerning what may be done with that information.

The firm collects personal information about customers from the following sources:

• Information customers provide to complete their financial plan or investment recommendation;

• Information customers provide in engagement agreements and other documents completed in connection with the opening and maintenance of an account;

• Information customers provide verbally; and

• Information received from service providers, such as custodians, about customer transactions.

The firm does not disclose non-public personal information about our customers to anyone, except in the following circumstances:

• When required to provide services our customers have requested;

• When our customers have specifically authorized us to do so;

• When required during the course of a firm assessment (i.e., independent audit); or

• When permitted or required by law (i.e., periodic regulatory examination).

Within the firm, access to customer information is restricted to personnel that need to know that information. All access persons and service providers understand that everything handled in firm offices are confidential and they are instructed not to discuss customer information with someone else that may request information about an account unless they are specifically authorized in writing by the customer to do so. This includes, for example, providing information about a spouse’s IRA or to children about a parent’s account.

To ensure security and confidentiality, the firm maintains physical, electronic, and procedural safeguards to protect the privacy of customer information.

The firm will provide you with its privacy policy on a cyclical basis per regulatory guidelines and at any time, in advance, if firm privacy policies are expected to change.

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

Neither the firm nor an associate is authorized to recommend to a client, or effect a transaction for a client, involving any security in which the firm or a “related person” (e.g., associate, an immediate family member, etc.) has a material financial interest, such as in the capacity as a board member, underwriter or advisor to an issuer of securities, etc.

An associate is prohibited from borrowing from or lending to a client unless the client is an approved financial institution.

Our firm remains focused on ensuring that its offerings are based upon the needs of its clients, not resultant fees received for such services. We want to note that you are under no obligation to act on a recommendation from our firm and, if you elect to do so, you are under no obligation to complete them through our firm or a service provider whom we may recommend.

***Firm/Personnel Purchases of Same Securities Recommended to Clients and Conflicts of Interest***

Our firm does not trade for its own account (e.g., proprietary trading). The firm’s related persons may buy or sell securities that are the same as, similar to, or different from, those recommended to clients for their accounts, and this poses a conflict of interest. We mitigate this conflict by ensuring that we have policies and procedures in place to ensure that the firm or a related person will not receive preferential treatment over a client. In an effort to reduce or eliminate certain conflicts of interest involving personal trading (i.e., trading ahead of client recommendation, etc.), firm policy may require that we periodically restrict or prohibit related parties’ transactions. Any exceptions must be approved in writing by our Chief Compliance Officer, and personal trading accounts are reviewed on a quarterly or more frequent basis. Please refer to Item 6 of the accompanying Form ADV Part 2B for further details.

# Item 12 - Brokerage Practices

***Factors Used to Select Broker/Dealers for Client Transactions***

O’Neill Financial Planning LLC does not take custody of client assets. Your account must be maintained by a qualified custodian (generally a broker/dealer, bank or trust company) that is frequently reviewed for its capabilities to serve in that capacity by their respective industry regulatory authority. Our firm is not a custodian nor is there an affiliate that is a custodian.

We do not require that you open and maintain an accountant with a specific custodian. You may engage the custodian or broker of your choice. Should you prefer that we suggest a provider to you, our recommendation will be based on your needs, overall cost, and ease of use. We do not receive referrals from a custodian that we suggest, nor are client referrals a factor in our recommendation of a custodian. Also note that you will open your account with your custodian by entering into an account agreement directly with them. We do not open the account for you but we will assist you in that process.

Our firm prohibits non-cash compensation (termed "soft dollars" in certain jurisdictions), and will not “pay up” to receive additional services from a service provider. All compensation paid to the firm is paid directly by our clients as noted in Item 5.

***Directed Brokerage/Best Execution***

Our firm does not require or engage in directed brokerage involving client accounts. Clients are free to use any particular service provider to execute their transactions and they are responsible for negotiating any terms or arrangements for their account. Our firm will not be obligated to conduct due diligence of the client’s selected service provider, seek better execution services or prices from any provider, or aggregate client transactions for trade execution. Since your transactions are completed at a service provider of your choice, you may potentially pay more for your transaction or experience wider price spreads. In light of the nature of our firm’s advisory services, it is believed “best execution” review obligations with regard to client transactions are not required under current industry guidelines.

***Aggregating Securities Transactions***

Our firm is not engaged for ongoing portfolio management nor do we serve an account on a discretionary basis. We are therefore unable to aggregate (“batch”) trades on behalf of client accounts. Since transactions may be completed independently at a service provider of your choice, you may potentially pay more for your transaction or experience wider price spreads than those accounts where trades have been aggregated.

# Item 13 - Review of Accounts

Periodic scheduled reviews are encouraged, and we recommend they occur on at least on an annual basis. Reviews will be conducted by Paul O’Neill and typically involve analysis and possible revision of your previous plan or investment allocation. A copy of revised plans or asset allocation reports will be provided upon client request.

You should contact our firm for additional reviews when you anticipate or have experienced changes in your financial situation (i.e., changes in employment, an inheritance, the birth of a new child, etc.), or should you prefer to change requirements involving your investment account. Non-periodic reviews are conducted by Paul O’Neill, and a copy of revised plans or asset allocation reports will be provided to the client upon request.

You will receive account statements sent directly from mutual fund companies, transfer agents, plan administrators, custodians or brokerage companies where your investments are held. We urge you to carefully review these account statements for accuracy and clarity, and to ask questions when something is not clear.

Our firm does not provide account-level performance reporting. Clients are urged to carefully review and compare account statements that they have received from their account custodian with any report they may receive from any source if that report contains any type of performance information.

# Item 14 - Client Referrals and Other Compensation

We do not engage in solicitation activities involving unregistered persons. If we receive or offer an introduction to a client, we do not pay or earn referral fee, nor are there established *quid pro quo* arrangements. Each client retains the option to accept or deny such referral or subsequent services.

An associate of the firm may hold individual membership or serve on boards or committees of professional industry associations. Generally, participation in any of these entities require membership fees to be paid, adherence to ethical guidelines, as well as in meeting experiential and educational requirements. A benefit these entities may provide to the investing public is the availability of online search tools that allow interested parties (prospective clients) to search for individual association members within a selected state or region. These passive websites may provide means for interested persons to contact an association member via electronic mail, telephone number, or other contact information, in order to interview the member.

The public may also choose to telephone association staff to inquire about an individual within their area, and would receive the same or similar information. A portion of association membership fees may be used so that the member’s name will be listed in some or all of these entities’ websites (or other listings).

Prospective clients locating our advisory firm or an associate of our firm via these methods are not actively marketed by the noted associations. Clients who find our firm in this way do not pay more for their services than clients referred in any other fashion. The firm does not pay these entities for prospective client referrals, nor is there a fee-sharing arrangement reflective of a solicitor engagement.

# Item 15 – Custody

Accounts will be maintained by an unaffiliated, qualified custodian, such as a bank, trust company, broker/dealer, mutual fund companies or transfer agent. Assets are not maintained by our firm or any associate of our firm. In keeping with this policy involving our clients’ funds or securities, our firm:

* Restricts the firm or an associate from serving as trustee or having general power of attorney over a client account;
* Prohibits any associate from having authority to directly withdraw securities or cash assets from a client account;
* Does not accept or forward client securities (i.e., stock certificates) erroneously delivered to our firm;
* Will not collect advance fees of $500 or more for services that are to be performed six months or more into the future; and
* Will not authorize an associate to have knowledge of a client’s account access information (i.e., online 401(k), brokerage or bank accounts) if such access would allow physical control over account assets.

Your custodian of record will provide transaction confirmations and account statements, which will include all debits and credits for each period. Statements are provided on at least a quarterly basis or as transactions occur within their account. Our firm will not create an account statement for a client or serve as the sole recipient of an account statement.

As a reminder, should you ever receive a report from any source that includes investment performance information, you are urged to carefully review and compare your account statements you have received directly from your custodian of record with any performance-related report.

# Item 16 - Investment Discretion

We provide our services on a nondiscretionary basis which requires your ongoing prior approval involving the investment and reinvestment of account assets or portfolio rebalancing. You will be required to execute our firm’s client agreement that describes our limited account authority, as well as your custodian of record’s account opening document that includes their limited power of attorney form or clause. Please note that in light of the requirement for your pre-approval you must make yourself available and keep our firm updated on your contact information so that instructions can be efficiently effected on your behalf.

# Item 17 - Voting Client Securities

You may periodically receive proxies or other similar solicitations sent directly from your selected custodian or transfer agent. Should we receive a duplicate copy, note that we do not forward these or any correspondence relating to the voting of your securities, class action litigation, or other corporate actions.

Our firm does not vote proxies on your behalf. We do not offer guidance on how to vote proxies, nor will we offer guidance involving any claim or potential claim in any bankruptcy proceeding, class action securities litigation or other litigation or proceeding relating to securities held at any time in a client account, including, without limitation, to file proofs of claim or other documents related to such proceeding, or to investigate, initiate, supervise or monitor class action or other litigation involving client assets. We will answer limited questions with respect to what a proxy voting request or other corporate matter may be and how to reach the issuer or their legal representative.

You will maintain exclusive responsibility for directing the manner in which proxies solicited by issuers of securities that are beneficially owned by you shall be voted, as well as making all other elections relative to mergers, acquisitions, tender offers or other legal matters or events pertaining to your holdings. You should consider contacting the issuer or your legal counsel involving specific questions you may have with respect to a particular proxy solicitation or corporate action.

# Item 18 - Financial Information

Our advisory firm will not take physical custody of client assets, nor do we have the type of account authority to have such control.

Engagements with our firm do not require that we collect fees from a client of $500 or more for our advisory services that we have agreed to perform six months or more into the future.

Neither our firm nor its management serve as general partner for a partnership or trustee for a trust in which the firm’s advisory clients are either partners of the partnership or beneficiaries of the trust.

The firm and its management do not have a financial condition likely to impair its ability to meet commitments to clients, nor has the firm and its management been the subject of a bankruptcy petition.

Due to the nature of our firm’s advisory services and operational practices, an audited balance sheet is not required nor included in this brochure.

# Item 19 - Requirements for State-Registered Advisers

For further information involving firm principal executive and management personnel, their business activities as well as material conflicts of interest, please refer to areas previously disclosed in Items 6 and 9 through 11, as well as the accompanying Form ADV Part 2B brochure supplement that immediately follows this page (e.g., formal education information and avoidance of performance-based fee compensation). Per Item 10 of this brochure, neither the firm nor a member of its management has a material relationship with the issuer of a security.

orm ADV Part 2B – Stuart Brogan

# Item 1 – Cover Page

**O’Neill Financial Planning LLC**

Registered Investment Advisor

O’Neill Financial Planning LLC

9423 La Bianco Street

Estero, FL 33967

(630) 248-6401

www.oneillfinancialplanning.com

**Paul E. O’Neill, CFP®**

Principal/Chief Compliance Officer

Investment Advisor Representative

Managing Member

Form ADV Part 2B

Brochure Supplement

February 18, 2017

**This brochure provides information about Paul E. O’Neill that supplements the O’Neill Financial Planning LLC Form ADV Part 2A firm brochure. You should have received a copy of that brochure. Please contact Paul E. O’Neill at (630) 248-6401 if you did not receive the full brochure or if you have any questions about the contents of this supplement. Additional information about Paul E. O’Neill is available on the Securities and Exchange Commission’s (SEC) website at www.adviserinfo.sec.gov under CRD #6611026.**

**Item 2 – Educational Background and Business Experience**

Regulatory guidance requires the firm to disclose relevant post-secondary education and professional training for each principal executive and associate of the firm, as well as their business experience for at least the most recent five years.

Principal Executive Officers and Management Persons

***Principal/Chief Compliance Officer/Investment Advisor Representative/Managing Member***

**Paul Edward O’Neill**

Year of Birth: 1945 / CRD Number: 6611026

Educational Background and Business Experience

***Educational Background***

Certified Financial Planner™ Professional, CFP®/Certified Financial Planner Board of Standards, Inc. 1

Doctor of Education (Adult Continuing Education), Northern Illinois University; DeKalb, IL

Masters of Business Administration (Operations Management), Loyola University; Chicago, IL

Bachelors of Science (Psychology), Loyola University; Chicago, IL

***Business Experience***

O’Neill Financial Planning LLC (01/2016-Present)

Estero, FL

Principal/Managing Member (01/2016-Present)

Chief Compliance Officer/Investment Advisor Representative (02/2016-Present)

Self-Employed (07/2012-01/2016)

Estero, FL

Owner

National Louis University (08/1996-07/2012)

Chicago, IL

Associate Professor

**Item 3 – Disciplinary Information**

Registered investment advisors are required to disclose certain material facts about its associated personnel regarding any legal or disciplinary events, including criminal or civil action in a domestic, foreign or military court, or any proceeding before a state, federal or foreign regulatory agency, self-regulatory organization, or suspension or sanction by a professional association for violation of its conduct rules, that would be material to your evaluation of each officer or a supervised person providing investment advice. Paul O’Neill has not been the subject of any such event.

**Item 4 – Other Business Activities**

Investment advisor representatives are required to disclose outside business activities that account for a significant portion of their time or income, or that may present a conflict of interest with their advisory activities.

Neither Paul O’Neill nor our advisory firm has a material relationship with the issuer of a security. He is not registered, nor has an application pending to register, as a registered representative of a broker/dealer or associated person of a futures commission merchant, commodity pool operator, or commodity trading advisor. He does not receive commissions, bonuses or other compensation based on the sale of securities, including that as a registered representative of a broker/dealer or the distribution or service (“trail”) fees from the sale of mutual funds.

**Item 5 – Additional Compensation**

Neither our advisory firm nor Paul O’Neill is compensated for advisory services involving performance-based fees. In addition, firm policy does not allow associated persons to accept or receive additional economic benefit, such as sales awards or other prizes, for providing advisory services to firm clients.

**Item 6 – Supervision**

Paul O’Neill serves as the firm’s Chief Compliance Officer. Because supervising one’s self poses a conflict of interest, the firm has adopted policies and procedures to mitigate this conflict, and may use the services of unaffiliated professionals to ensure the firm’s oversight obligations are met. Questions relative to the firm, its services or this Form ADV Part 2B brochure supplement may be made to the attention of Paul O’Neill at (630) 248-6401.

Additional information about the firm, other advisory firms, or an associated investment advisor representative is available on the internet at www.adviserinfo.sec.gov. A search of this site for firms may be accomplished by firm name or a unique firm identifier, known as an IARD or CRD number. The IARD number for O’Neill Financial Planning LLC is 282870.

The business and disciplinary history, if any, of an investment advisory firm and its representatives may also be obtained by calling the Florida Division of Securities at (850) 487-9687 or the state securities administrator in which the client resides.

**Item 7 - Requirements for State-Registered Advisers**

There have been neither awards nor sanctions or other matter where Paul O’Neill or O’Neill Financial Planning LLC has been found liable in an arbitration, self-regulatory or administrative proceeding. Neither Paul O’Neill nor our advisory firm has been the subject of a bankruptcy petition.

***Important Information about Industry Designations and Examinations***

1The **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 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 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.

1. Refer to the end of this brochure for an explanation of designation prerequisites and continuing education requirements. [↑](#footnote-ref-1)
2. The term “assets under management” as defined by the SEC’s *General Instructions for Part 2 of Form ADV*. [↑](#footnote-ref-2)
3. For an explanation of the term “PCI,” who the PCI Security Standards Council is, as well as its comprehensive standards to enhance payment card data security, please go to https://www.pcisecuritystandards.org/security\_standards/index.php [↑](#footnote-ref-3)