

## Item 1 – Cover Page

### Practical Financial Planning, Inc. Part 2A and 2B of Form ADV

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Practical Financial Planning, Inc.  
20525 Center Ridge Road, Suite 501  
Rocky River, Ohio 44116  
216.688.3737  
[www.p-f-p.com](http://www.p-f-p.com)

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This Brochure provides information about the qualifications and business practices of Practical Financial Planning, Inc. If you have any questions about the contents of this Brochure, please contact us at: 216-688-3737. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Practical Financial Planning, Inc. is a State of Ohio registered investment advisor. Registration of an investment advisor does not imply any level of skill or training. The oral and written communications of an advisor provide you with information you can use to determine to hire or retain an advisor.

Additional information about Practical Financial Planning, Inc. is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Throughout this document and the Appendix, the words “we”, “us”, “our” and the like refer to the Advisor. The words “you”, “your”, “yours” and the like refer to the client or clients.

January 25, 2019

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## Item 2 – Material Changes

This Brochure was last updated November 27, 2017. Described in this item are changes made to this Brochure since that time. We have updated:

Item 1 to show the firm’s new address.

Item 4 to show that the firm on occasion is compensated for the sale of books written by Kenneth F. Robinson and for speaking engagements.

Item 5 to clarify that a client may terminate an engagement by providing written notice within five *business* days of signing a Retainer agreement.

Item 8 to clarify that we recommend certain investment options available in workplace retirement savings plans.

Item 10 to show that Britta A. Koepf, CFP® is a member of the National Association of Personal Financial Advisors (NAPFA).

Appendix A Item 1 to show the firm’s new address.

We will ensure that clients are offered a summary of any material changes to this and subsequent Brochures within 90 days of any material change. We may further provide other ongoing disclosure information about material changes as necessary. We will further provide clients with a new Brochure as necessary based on changes or new information, at any time.

Currently, our Brochure may be requested by contacting us at 216-688-3737, or by writing to Practical Financial Planning, 20525 Center Ridge Road, Suite 501, Rocky River, OH 44116. Brochures are provided free of charge.

The SEC’s web site also provides information about any persons affiliated with Practical Financial Planning, Inc. who are registered as Investment Advisor Representatives.

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## Item 4 – Advisory Business

Practical Financial Planning, Inc. (“PFP”, “Advisor”, “we”, “us”, “our”, etc.) is a fee-only holistic financial planning firm that specializes in providing holistic financial planning and investment advisory services to individuals and families. We are owned and operated by Kenneth F. Robinson (“Ken”), who established Practical Financial Planning, Inc. in 2005 under the name The Kenneth Robinson Company. Prior to that time, Ken operated his financial planning practice as a sole proprietor. He established his practice as a full-time endeavor in 2000.

We offer a wide range of financial services. Specifically, we distinguish ourselves from traditional investment advisory firms by providing services to meet not only your investment needs, but your tax, estate planning, risk management, retirement planning, cash flow, record-keeping, life planning, and business development needs as well.

Our primary role is to make planning and investment recommendations. You may, if you wish, authorize us to execute trades in your accounts on a non-discretionary basis. This means we need your authorization for each specific investment trade we carry out on your behalf. You are not obligated to provide this authority, and we will give you specific investment and planning recommendations whether or not you authorize trading authority. Without appropriate authority, we have no access to act with respect to your funds and do not execute trades in your accounts. In that case, you are solely responsible to implement any recommendations we make, and you are not required to follow any recommendations we make. Our fees are not based on whether or not we have trading authority for any account(s), and we receive no compensation from any source other than our clients and, on occasion, from the purchase of one of Ken’s books or from speaking engagements.

We will enter into a written agreement with you that details the scope of the relationship and responsibilities of both you and us. Advice and services provided under the agreement are tailored to your questions and/or stated objectives.

We do not sell insurance or investment products, and do not accept commissions as a result of any product recommendations. We do not pay referral or finders’ fees, nor do we accept such fees from other financial firms. However, in one case in which a colleague of ours retired from financial planning, we have agreed to pay that colleague and their successors in interest for one of their clients who agreed to become our client in order to continue to receive investment advice. We remain prepared to do so in the future for other colleagues whose clients may benefit from becoming clients of our practice.

We provide the following types of personal financial planning services:

## Standard Retainer

The Standard Retainer is an open retainer relationship providing holistic, comprehensive financial planning for a fixed fee over the course of one year. You will typically have up to six scheduled meetings during the initial year, depending on your individual situation, and generally three or four scheduled meetings during renewal years. In addition to scheduled meetings, we include any additional face-to-face, e-mail, video, and/or phone consultations at no additional charge.

The services we provide may include, but are not necessarily limited to: tax preparation, tax planning, insurance review, inventory of assets, analysis of financial and life goals, portfolio analysis, development of an asset allocation strategy, no-load mutual fund recommendations, retirement planning and estate plan reviews.

Scheduled topics are listed below. We will schedule meetings to cover such of these topics as we judge to be relevant to you, such as:

- Tax planning
- Tax preparation
- Credit and cash flow
- Record-keeping
- Inventory of assets and liabilities
- Portfolio analysis
- Asset allocation strategy
- Investment recommendation
- Small business planning (on Client request)
- Insurance analysis
- Employee benefits analysis
- Life planning and goal setting
- Education planning
- Retirement planning
- Estate planning
- Investment review
- Portfolio rebalancing
- Goal setting/review
- Financial planning and/or other financial services as you may request or as we believe you may need

If you prefer, and if we agree that it is appropriate to your situation, we may establish an open retainer limited to investment advice, and tax guidance appropriate to your investment situation.

## **Wealth Management Retainer**

In addition to the services of a Standard Retainer, the Wealth Management Retainer gives wealthier clients more frequent review of and action on savings, investments and cash flow. The Wealth Management Retainer includes monthly contact from us in both the initial and renewal years of the retainer.

## **Review Project**

The Review Project provides services for situations in which a Standard Retainer relationship is not appropriate or practical. Review Project services are narrower in scope and usually focus on one or more of the following areas:

- Goal setting
- Asset/liability analysis
- Tax planning
- Cash flow management
- Investment review
- Retirement planning
- Risk management
- Estate planning
- Record keeping

The service includes various client consultations as well as written and/or oral recommendations resulting from such consultations. The Review Project does not constitute a comprehensive financial planning engagement and follow-up advice and/or implementation assistance is not provided following the completion of the project. Additionally, tax return preparation is not automatically included with the Review Project, but may be purchased as a separate service, at your request, for an additional fee.

If you wish to upgrade to the Standard Retainer option and are accepted as a Standard Retainer client, you may receive credit toward Standard Retainer fees for all or a part of amounts paid under Review Project agreements for at least the past three months.

## **Financial Fitness Review**

A Financial Fitness Review consists of a two-hour review of up to three financial planning topics that you select in advance. We do not provide follow-up services with the Financial Fitness Review. If you wish to upgrade to the Standard Retainer option and are accepted as a Standard Retainer client, you may receive credit toward Standard Retainer fees for all amounts paid for a Financial Fitness Review for at least the past 30 days.

## **Retirement Plan Consultation**

In addition to providing the personal financial planning services described above, in situations that directly affect one or more of our financial planning clients we also offer Retirement Plan Consultation to organizations for workplace retirement plans such as 401(k), 403(b), and 457 plans. Services may include plan design analysis, plan fee assessment/negotiation, investment policy development, performance reporting and analysis, and plan selection.

## **Item 5 – Fees and Compensation**

Practical Financial Planning, Inc. is a fee-only financial advisory firm and does not sell investment or insurance products. In addition to our fee, you may incur certain other fees and charges to implement our recommendations. Custodians, brokers, and third-party investment professionals and/or salespersons impose additional charges, and other third parties may charge fees such as fees charged by managers, custodial fees, deferred sales charges, transaction fees, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes. Mutual funds and exchange-traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to our fee.

Fees are generally not negotiable. You may terminate an engagement by providing written notice within five business days of signing a Retainer agreement. Additionally, either party may terminate a retainer agreement, without penalty, at any time upon 30 calendar days written notice. We will promptly refund any prepaid but unearned fees. Any fees that have been earned but not yet paid by the client will be due and payable. We, in our sole discretion, will determine whether fees have been earned or unearned, following any applicable terms in our written agreement. For all professional relationships, additional fees may be charged for travel or other out-of-pocket expenses. In no event will we collect from any client more than \$500.00 more than six months in advance in return for investment advice.

### **Standard Retainer**

Initial Year of Standard Retainer: \$5,000 - \$25,000.

Renewal Years of Standard Retainer: \$3,000 - \$20,000. (Certain legacy clients are charged \$300-\$3,000.)

Fees are calculated annually and payable quarterly, in advance. You may make certain other payment arrangements if you prefer. We calculate fees based on your total income, assets, and overall complexity of your financial situation, as well as the value added by the advisory relationship and the degree of responsibility we accept.

Add-ons, credits, and miscellaneous adjustments: A charge of \$200-\$1,000 is assessed for each amended tax return prepared, if applicable. A charge of up to \$100 per return may be assessed for additional tax returns prepared for your spouse or your dependents. Credits and

miscellaneous adjustments may be applied for other reasons, as appropriate. Any credits or adjustments will be determined in our sole discretion.

### **Wealth Management Retainer**

Initial Year of Wealth Management Retainer: \$9,500 - \$40,000

Renewal Years of Wealth Management Retainer: \$9,500 - \$32,000

### **Review Project**

We typically provide services under the Review Project on a flat-fee basis, ranging from \$375 to \$20,000. We may negotiate an hourly fee of up to \$500 per hour for specific project requests. Review Project flat fees are due in full at the beginning of the engagement. In our sole discretion, fees may be paid in advance, or with a portion due at the beginning of the engagement and the remainder upon completion.

### **Financial Fitness Review**

The cost for a Financial Fitness Review is a flat fee of \$1,150. We may offer family or friends of clients a discounted fee. One-half of the fee is due with the signed agreement and one-half at the beginning of the Review appointment.

### **Retirement Plan Consultation**

Consulting fees not to exceed a \$10,000 fee.

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

We do not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of any client).

## **Item 7 – Types of Clients**

We provide holistic financial planning and investment advisory services primarily for individuals and families. We strive to work with people from all different walks of life. Accordingly, we maintain no minimum net-worth or asset requirements. Your chosen relationship agreement and fee will be based upon your individual circumstances.

In situations that directly affect one or more of our financial planning clients, we can provide retirement plan consultation to organizations looking to minimize the costs borne by their plan participants and participant beneficiaries.



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

The main sources of information we may rely upon when researching and analyzing securities will include traditional research materials such as financial websites and magazines, annual reports, prospectuses, filings with the SEC, as well as research materials prepared by others, company press releases, and corporate rating services. We may also subscribe to various professional publications deemed to be consistent and supportive of our investment philosophy.

Moreover, we approach investment portfolio analysis and implementation based on internal factors such as your tax situation, overall risk tolerance, current financial situation, and your personal goals and aspirations. After identifying these items, we will recommend a structure for your portfolio based on your individual needs, while minimizing negative effects of external factors, such as interest rates, market performance, and the economy as a whole.

In general, we recommend no-load mutual funds (i.e., mutual funds that have no sales fees), exchange traded funds, U.S. government securities, money market accounts, certificates of deposit, individual bonds (corporate, agency and municipal), and certain investment options available in workplace retirement savings plans. However, in the course of providing investment advice, we may address issues related to other types of assets that you may already own. We will also discuss any other products we deem appropriate for you, based upon your goals, needs and objectives.

Any investment in securities involves risk of loss that you should be prepared to bear. We cannot predict the future, and while we will use our best judgment and good faith efforts in rendering services to you, not every investment decision or recommendation we make will be profitable. We cannot warrant or guarantee any particular level of account performance, or that any particular investment or combination of investments will be profitable over time. You assume all market risk involved and understand that investment decisions are subject to various market, currency, economic, political, business, and other risks.

## **Item 9 – Disciplinary Information**

As a Registered Investment Adviser, we are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Practical Financial Planning, Inc. or the integrity of Practical Financial Planning, Inc.’s management. We have no information to disclose applicable to this Item.

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

Kenneth F. Robinson (“Ken”) and Britta A. Koepf (“Britta”) are members of the Alliance of Comprehensive Planners (ACP, formerly known as Alliance of Cambridge Advisors [ACA]).

This non-profit organization provides training and support through an alliance of fiduciary fee-only comprehensive financial advisors. As members of ACP, Ken and Britta have the right to use proprietary products and systems designed by ACP. ACP offers education in the form of in-person, web- and tele-conferences (which may provide continuing education credits) and services produced by collaborative efforts of the fee-only financial advisors.

Ken and Britta are also members of the National Association of Personal Financial Advisors (NAPFA), which requires that its members are fee-only and obtain a minimum of 60 continuing education credits every two years.

We are affiliated with Schwab Advisor Services, and with TDAmeritrade Institutional. Ken is an approved advisor by Dimensional Fund Analysts. We receive no compensation from any of these affiliations.

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

PFP seeks to avoid material conflicts of interest. Accordingly, neither we nor our Investment Adviser Representatives nor our team members receive any third party direct monetary compensation (i.e., commissions, 12b-1 fees, or other fees) from brokerage firms (custodians) or mutual fund companies.

However, some additional services and non-direct monetary or other forms of compensation may be offered and provided to us as a result of our relationships with custodian(s) and/or provider(s) of mutual fund products. For example, our representatives and employees may be invited to attend educational conferences and/or entertainment events sponsored by such brokerage firms or custodians or mutual fund companies. We believe that the services and benefits provided to us by brokerage firms (custodians) and mutual fund providers do not materially affect the investment management recommendations made to you. However, in the interest of full disclosure of any potential conflicts of interest, we discuss the possible conflicts herein.

Although we believe that our business methodologies, ethics rules, and adopted policies are appropriate to eliminate, or at least minimize, potential 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 potential material conflicts of interest. In any event, we will disclose to you any material conflict of interest relating to us, our representatives, or any of our employees that could reasonably be expected to impair the rendering of unbiased and objective advice.

### **Our Code of Ethics**

We have adopted a Code of Ethics for all supervised persons of the firm describing our high standard of business conduct, and fiduciary duty to our clients. The Code of Ethics includes

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provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons must acknowledge the terms of the Code of Ethics annually, or as amended.

### **Participation or Interest in Client Transactions and Personal Trading**

Generally, we and our related persons, as a matter of policy, do not recommend to clients, or buy or sell for client accounts, securities in which the firm or its related persons has a material financial interest.

Certain classes of securities, such as open-end mutual funds, and exchange-traded funds which follow an index, are designated as exempt transactions, meaning employees may trade these without prior permission because such trades would not materially interfere with the best interest of our clients. Nonetheless, because the Code of Ethics permits employees to invest in the same securities as clients, there is a possibility (however remote) that employees might somehow benefit from the market activity of a client. Accordingly, when applicable, employee trading is monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between us and our clients.

We or individuals associated with us may buy and sell some of the same securities for our own accounts that we recommend that any client buy or sell. When appropriate we will assist or advise you to purchase or sell securities before purchasing or selling the same securities for our own account. In some cases we may buy or sell securities for our own account for reasons not related to the strategies adopted by our clients. The Code of Ethics is designed to assure that the personal securities transactions will not interfere with making decisions in the best interest of advisory clients while at the same time allowing employees to invest for their own accounts.

We will disclose to advisory clients any material conflict of interest relating to us, our representatives, or any of our employees that could reasonably be expected to impair the rendering of unbiased and objective advice. We will notify clients in advance of policies in respect to officers trading for their own account including the potential conflict of interest that arises when recommending securities to clients in which we or our principal holds a position.

### **Item 12 – Brokerage Practices**

We may use our discretion when recommending a broker-dealer. You are not obligated to effect transactions through any broker-dealer we recommended. When recommending a broker-dealer we will comply with our fiduciary duty to obtain best execution and with the Securities Exchange Act of 1934, and will take into account such relevant factors as:

- Cost to the client

- The broker-dealer's facilities, reliability and financial responsibility
- The ability of the broker-dealer to effect transactions, particularly with regard to such aspects as timing, order size and execution of order
- The research and related brokerage services provided by such broker or dealer to us, notwithstanding that the account may not be the direct or exclusive beneficiary of such services
- Any other factors we consider to be relevant

There is no obligation for any client to use any broker. No commission or any part thereof will be received by, or shall otherwise benefit, us or any related person. We typically use no broker research as a result of any client account at any broker. We have received occasional client referrals from a broker, but we provide no compensation or quid pro quo of any kind to any such broker. Our fees are not split or shared with any entity.

We participate in Schwab Advisor Services and with TD Ameritrade Institutional to streamline development and execution of Client recommendations, as described elsewhere in this document. Clients are not obligated to have accounts at Schwab or TD Ameritrade, and Client fees are not dependent in whole or in part on Schwab or TD Ameritrade being a custodian of Client assets.

### **Item 13 – Review of Accounts**

Practical Financial Planning, Inc., through its Investment Advisor Representatives, Kenneth F. Robinson and Britta A. Koepf, is responsible for reviewing and assessing financial recommendations made to you. We will provide you with the Supplemental Brochure (Form ADV Part 2B) for Kenneth F. Robinson and Britta A. Koepf. Factors triggering review may include client requests, significant changes in your financial condition, and changes in the fundamentals of the companies or entities issuing securities, price fluctuations and significant economic or industry developments.

You will receive financial plan recommendations from time to time during the term of your engagement to us.

If you maintain any brokerage account(s), your custodian should provide a statement at least quarterly which includes a list of all assets held in the account, asset values, and all transactions affecting the account assets, including any additions or withdrawals.

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

We are a fee-only financial planning firm, and we do not sell insurance or investment products, nor do we accept commissions as a result of any product recommendations. We do not ordinarily pay referral or finder's fees, nor do we accept such fees from other firms. However, in one case

in which a colleague of ours retired from financial planning, we have agreed to pay that colleague and their successors in interest for one of their clients who agreed to become our client in order to continue to receive investment advice. We remain prepared to do so in the future for other colleagues whose clients may benefit from becoming clients of our practice.

## **Item 15 – Custody**

We do not have custody over client funds and securities. Accordingly, we shall have no liability to you for any loss or other harm to any property in the account.

You should receive at least quarterly statements from the broker-dealer, bank or other qualified custodian that holds and maintains your investment assets. We urge all clients to carefully review such statements and compare such official custodial records to any statements that we may provide to you. We may also provide you with periodic reports on your accounts. These reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

## **Item 16 – Investment Discretion**

Our role is to make investment and planning recommendations. We do not have authority over client funds and do not execute trades in clients' accounts unless specifically authorized by the client to do so. When we do trade in Client accounts, we do so only with the express direction of the Client to execute each individual trade (even if documents establishing trading authority with a custodian indicate that we possess authority to act independently of your instruction). You are not required to follow any recommendations we make. If we have not been granted the authority to place any trade or trades, you are solely responsible to implement any recommendations we make, although we will be happy to assist you in carrying out any transaction or series of transactions.

## **Item 17 – Voting Client Securities**

As a matter of firm policy and practice, we do not accept and do not have any authority to and do not vote proxies on your behalf. You retain the responsibility for receiving and voting proxies for any and all securities maintained in your portfolio. At your request, we may provide advice to you, regarding your voting of proxies.

## Item 18 – Financial Information

Registered Investment Advisors are required to provide you with certain financial information or disclosures about their financial condition. We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to you and have not been the subject of a bankruptcy proceeding.

## Item 19 – Requirements for State-Registered Advisors

### EDUCATION & BUSINESS BACKGROUND

Firm Principal: Kenneth Frank Robinson.

#### Education

- A.B. 1983, Cornell University.
- J.D. *cum laude*, 1986, Case Western Reserve University.
- Associate in Risk Management, 1990, Insurance Institute of America, Inc.
- CHARTERED MUTUAL FUND COUNSELOR™, earned 1996 (no longer maintained), National Endowment for Financial Education.
- CERTIFIED FINANCIAL PLANNER™ Professional Education Program, Certificate of Completion 1999, College for Financial Planning.
- CERTIFIED FINANCIAL PLANNER™ (CFP®) certificate, 2003, Certified Financial Planner Board of Standards, Inc.
- Accredited Investment Fiduciary® (AIF®) designation, earned 2010 (no longer maintained), FI 360.

#### Business Background

- Personal financial planner (part-time 1996-2000, full-time from March 14, 2000 to present).
- Lawyer in private practice 1986-2013 (self-employed part-time 1990-2013).

Information on prior employment available on request.

Associate: Britta A. Koepf.

#### Education

- B.A. 2008, Hiram College.
- CERTIFIED FINANCIAL PLANNER™ Professional Education Program, Certificate of Completion 2015, The University of Akron.

- CERTIFIED FINANCIAL PLANNER™ (CFP®) certificate, 2017, Certified Financial Planner Board of Standards, Inc.

### **Business Background**

- Paraplanning and financial planning (full-time from June 2015 to present).
- Client service internship (part-time December 2014 to May 2015).

Information on prior employment available on request.

Neither we nor any of our management personnel have ever been found liable or required to pay any award for an arbitration claim or other civil proceeding related to an investment related activity.

## Appendix A: Supplement Brochure

### Item 1 – Cover Page

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Practical Financial Planning, Inc.  
20525 Center Ridge Road, Suite 501  
Rocky River, Ohio 44116  
216.688.3737  
January 25, 2019

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This Brochure Supplement provides information about the firm’s Investment Advisor Representatives that supplements the Brochure for Practical Financial Planning, Inc. You should have received a copy of that Brochure. Please contact our office if you did not receive Practical Financial Planning, Inc.’s Brochure or if you have any questions about the contents of this supplement.

Additional information about Practical Financial Planning’s Investment Advisor Representatives is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).



## Item 2 – Educational and Business Standards

Practical Financial Planning, Inc. requires that advisors in its employ have a bachelor's degree and further coursework demonstrating knowledge of financial planning and tax planning. Examples of acceptable coursework include those designed to lead to an MBA, a CFP<sup>®</sup>, a CFA, a ChFC, JD, EA or CPA. Additionally, advisors must have work experience that demonstrates their aptitude for financial planning and investment management.

## Item 3 – Professional Certifications

Employees have earned certifications and credentials that are required to be explained further.

CERTIFIED FINANCIAL PLANNER<sup>™</sup> (CFP<sup>®</sup>): CERTIFIED FINANCIAL PLANNER<sup>™</sup> designees are licensed by the CFP<sup>®</sup> Board to use the CFP<sup>®</sup> mark. CFP<sup>®</sup> certification requirements include:

- Bachelor's degree from an accredited college or university.
- Completion of the financial planning education requirements set by the CFP Board (see [www.cfp.net](http://www.cfp.net)).
- Successful completion of the 6-hour CFP<sup>®</sup> certification exam.
- Qualifying full-time work experience.
- Successfully pass the Candidate Fitness Standards and background check.

## Item 4 - Disciplinary Information

Registered Investment Advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

## Item 5 - Other Business Activities

No advisor employed by the firm is actively engaged in any outside investment-related business activities and has no relationships that would create a material conflict of interest with clients.

Advisors do not receive commissions, bonuses or other compensation based on the sale of securities or other investment products.

Advisors are not actively engaged in any business or occupation that provides a substantial source of income or involves a substantial amount time, except as noted here.

Advisors' services do not constitute legal services or legal advice and are not subject to the same standards as would apply to legal matters. For example, and without limitation, the

confidentiality of attorney-client privilege does not extend to matters that are not considered legal services or legal advice.

## **Item 6 - Requirements for State-Registered Advisors**

Registered Investment Advisors are required to make disclosures if their Supervised Persons have been involved in any of the events listed below:

1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
  - a. an investment or an investment-related business or activity;
  - b. fraud, false statement(s), or omissions;
  - c. theft, embezzlement, or other wrongful taking of property;
  - d. bribery, forgery, counterfeiting, or extortion; or
  - e. dishonest, unfair, or unethical practices.
2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
  - a. an investment or an investment-related business or activity;
  - b. fraud, false statement(s), or omissions;
  - c. theft, embezzlement, or other wrongful taking of property;
  - d. bribery, forgery, counterfeiting, or extortion; or
  - e. dishonest, unfair, or unethical practices.
3. If the supervised person has been the subject of a bankruptcy petition, disclose that fact, the date the petition was first brought, and the current status.

## **Item 7 - Employee Information**

### **Kenneth F. Robinson.**

Born 1961.

#### **Education**

A.B. 1983, Cornell University.

J.D. *cum laude*, 1986, Case Western Reserve University.

Associate in Risk Management, 1990, Insurance Institute of America, Inc. (Three semester-long courses covering fundamentals of risk management, risk control, and risk financing. Self-study followed by proctored examinations.)

CHARTERED MUTUAL FUND COUNSELOR™, 1996, National Endowment for Financial Education. (Nine week-long modules on various aspects of mutual funds. Self-study followed by proctored examination.) Kenneth F. Robinson (“Ken”) voluntarily no longer maintains this designation.

CERTIFIED FINANCIAL PLANNER™ Professional Education Program, Certificate of Completion 1999, College for Financial Planning. (Five semester-long self-study courses covering subjects required for the education component of the CFP® designation, described below. All courses completed by proctored examinations.)

CERTIFIED FINANCIAL PLANNER™ (CFP®) certificate, 2003, Certified Financial Planner Board of Standards, Inc.

Accredited Investment Fiduciary® (AIF®) designation, 2010, FI 360. The following description has been suggested by the Center for Fiduciary Studies, LLC (a Fiduciary360 [fi360] company):

#### Accredited Investment Fiduciary® (AIF®)

The AIF® designation certifies that the recipient has specialized knowledge of fiduciary standards of care and their application to the investment management process. To receive the AIF® designation, individuals must complete a training program, successfully pass a comprehensive, closed-book final examination under the supervision of a proctor and agree to abide by the AIF® Code of Ethics. In order to maintain the AIF® designation, the individual must annually renew their affirmation of the AIF® Code of Ethics and complete six hours of continuing education credits. The certification is administered by the Center for Fiduciary Studies, LLC (a Fiduciary360 (fi360) company).

Ken voluntarily chose not to maintain this designation past late 2014.

#### Applicable Business Experience

Since 1996, personal financial planner, part-time until 2000, full-time beginning March 14, 2000. From 1986 to 2013, lawyer in private practice (self-employed part-time 1990 to 2013).

#### Disciplinary Information

None.

#### Other Business Activities

Ken is an author and speaker on personal finance and does devote time to and derive revenue from activities related to these pursuits.

#### Additional Compensation

None.

#### Supervision

Kenneth F. Robinson is sole owner of Practical Financial Planning, Inc., and is responsible for its advisory activities, and for seeing that advice his provided to clients is given in accordance with the Investment Policy Statement (or similar document which demonstrates suitability).

## Requirements for State-Registered Advisors

Arbitration award(s) and finding(s); civil, self-regulatory organization, or administrative proceeding(s); bankruptcy petition(s): None.

## Britta A. Koepf.

Born 1985

### Education

B.A. 2008, Hiram College

The University of Akron, Certificate in Financial Planning, May 2015. A 24-credit-hour classroom program covering subjects required for the education component of the CERTIFIED FINANCIAL PLANNER™ (CFP®) designation (described above).

CFP® examination, July 2015. Certified Financial Planner Board of Standards, Inc.

Series 65 examination, July 2016. FINRA. Acknowledged by the Ohio Department of Commerce, Division of Securities as an Investment Advisor Representative.

CERTIFIED FINANCIAL PLANNER™ (CFP®) certificate, 2017, Certified Financial Planner Board of Standards, Inc.

## Applicable Business Experience

Full-time paraplanning and financial planning since June 2015. Part-time client service internship from December 2014 to May 2015.

## Disciplinary Information

None.

## Other Business Activities

None

## Additional Compensation

None.

## Supervision

Some of Britta A. Koepf's activities are supervised by Kenneth F. Robinson, owner of Practical Financial Planning, Inc. Britta is responsible for seeing that her advice provided to clients is given in accordance with the Investment Policy Statement (or similar document which demonstrates suitability).

## Requirements for State-Registered Advisors

Arbitration award(s) and finding(s); civil, self-regulatory organization, or administrative proceeding(s); bankruptcy petition(s): None.