

Cover Page – Item 1



Accredited Investor Services, LLC

Doing Business As

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Form ADV Part 2A Brochure

Accredited Investor Services, LLC, doing business as AIS Planning (“AIS Planning”) is a registered investment adviser. An “investment adviser” means any person who, for compensation, engages in the business of advising others, either directly or through publications or writings, as to the value of securities or as to the advisability of investing in, purchasing, or selling securities, or who, for compensation and as part of a regular business, issues or promulgates analyses or reports concerning securities. Registration with the United States Securities and Exchange Commission (“SEC”) or any state securities authority does not imply a certain level of skill or training.

This brochure provides information about the qualifications and business practices of AIS Planning. If you have any questions about the contents of this Brochure, please contact us at (320) 252-6552. The information in this Brochure has not been approved or verified by the SEC or by any state securities authority.

Additional information about AIS Planning is available on the SEC’s website at www.adviserinfo.sec.gov.

Material Changes - Item 2

The purpose of this page is to inform you of any material changes since the previous version of this Disclosure Brochure.

On March 7, 2025, we submitted our annual updating amendment filing for fiscal year 2024. We have updated Item 4 of our Form ADV Part 2A Brochure to disclose discretionary assets under management of approximately \$334,822,289 and non-discretionary assets under management of approximately \$0.

We review and update our Disclosure Brochure at least annually to make sure that it remains current.

If you would like to receive a copy of our Form ADV Part 2 Brochure, please contact us at (320) 252-6552.

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Advisory Business - Item 4

Accredited Investor Services, LLC, doing business as AIS Planning, is a registered investment adviser based in St. Cloud, Minnesota. We are a limited liability company formed under the laws of the State of Minnesota, and we have been providing investment advisory services since 2008. Registration with the SEC or any state securities authority does not imply any level of skill or education.

Cathy L. Juilfs, Jason C. Hallonquist, and Nathan Goebel are the principal owners of AIS Planning. Cathy L. Juilfs is the Chief Executive Officer and Chief Compliance Officer of the firm.

Currently, we offer financial planning, investment management, and qualified retirement plan consulting services personalized to each client. You will see the term "Associated Person" throughout this Brochure to refer to anyone from our firm who is an officer, employee, or individual providing investment advice on behalf of our firm. Such persons are properly authorized and/or registered as investment adviser representatives ("IAR") in all required jurisdictions.

Initial Onboarding Process

Our initial onboarding process starts with an analysis of the client's financial situation and needs and the formulation of an action plan. Through this process, we strive to gain an understanding of who you are and what you care about, so we may advise and act in ways that meet your unique needs and objectives.

Financial Planning Advice

Our financial planning process is based on an effort to gain a deep understanding of client needs, personal values, and objectives to provide personalized investment advice that is designed to help clients achieve their financial goals. We believe that time spent getting to know our clients and their finances in detail is an important investment towards delivering quality advice. We do this by gathering information, reviewing data, and working through our analytic tools and processes to understand and assess the various facets of the client's life and wealth.

Financial planning advice and services may include, but are not limited to:

- Net worth and cash flow assessment and coaching
- Emergency account and cash flow planning
- Debt analysis and reduction strategy
- Behavioral risk analysis
- Retirement savings review
- Insurance review and assessment
- Education planning, funding, and monitoring
- Retirement income planning and coordination
- Estate and beneficiary planning (in coordination with the client's attorney)
- Tax planning (in coordination with the client's tax accountant)
- Outside asset review, advice, and monitoring
- Wealth transfer strategies

Our advice is based on your financial situation and the financial information you provide to our firm. You must provide all items that are necessary or desirable for AIS Planning to perform the fiduciary and ministerial tasks required of us, including information that accurately reflects fees on assets that may be rolled over into accounts managed by AIS Planning. If your financial situation, goals, objectives, or needs change, you must notify us promptly. You may choose to accept or reject our recommendations. If you decide to proceed with our recommendations, you may do so either through our firm or by using the advisory/brokerage firm of your choice.

Ongoing Investment Management

With the client's best interest in mind, AIS Planning provides access to a broad spectrum of investment solutions. We focus on delivering a personalized approach to developing and maintaining a customized portfolio, utilizing academic-based disciplines for asset allocation, diversification, and tax awareness. Our firm offers discretionary portfolio management services to our clients. Discretionary portfolio management means we will make investment decisions and place portfolio reallocation orders in your account without contacting you prior to each transaction. These decisions would be made based upon your stated investment objectives. If you wish, you may limit our discretionary authority by, for example, setting a limit on the type of securities that can be purchased for your portfolio. Simply provide us with your restrictions or guidelines in writing.

Currently, our investment management services are offered in conjunction with a sub adviser. The sub adviser assists our firm with back-office support, trading, report preparation, and billing. We use model portfolios developed by the sub adviser and/or other registered investment advisers. These other investment advisers are responsible for the research and security selection within model portfolios, day-to-day trading, billing calculation, and other back-office operations. AIS Planning is responsible for the supervision of the account, portfolio reallocations and rebalancing, and ongoing client interaction and servicing. At this time, AIS Planning uses the following programs:

SEI Investments Management Corporation ("SIMC")

SIMC gives us the ability to place client portfolios in their proprietary models, along with models created by AIS Planning and models provided by other investment advisers. All clients will be provided with a current copy of SIMC's Form ADV Part 2 Brochure at the inception of services. This document provides important disclosures about SIMC's services, portfolio models, fees, conflicts of interest, disciplinary history (if any), and other important information that would help clients understand the scope of sub advisory services provided by SIMC.

All accounts are managed in accordance with the client's investment needs. Investments may include various types of securities such as equity securities, Exchange Traded Funds (ETFs), mutual funds, corporate debt securities, municipal securities, and U.S. Government securities. Other types of investments may also be recommended where such investments are appropriate based on the client's stated goals and objectives.

American Funds Model Portfolios

The American Funds Model Portfolios Program ("American Funds Program") is a mutual fund advisory service that provides clients the opportunity to allocate assets among various asset classes that cover a variety of investment objectives. The American Funds Program is an asset allocation-based mutual fund investment program that invests exclusively in American Funds mutual funds.

Investments and allocations are determined and based upon the client's predefined objectives, risk tolerance, time horizon, financial horizon, financial information, and other various suitability factors. Further restrictions and guidelines imposed by the client may affect the composition and performance of a client's portfolio. For these reasons, performance of the portfolio may not be identical to other clients of AIS Planning. On an ongoing basis, AIS Planning reviews the client's financial circumstances and investment objectives, and instructs SIMC or American Funds to make the necessary adjustments to the client's portfolio.

Associated Persons of AIS Planning will periodically, as agreed upon with each client, review reports to measure the client's portfolio against the client's financial situation and objectives, communicate information to SIMC or American Funds as warranted, and assist the client in understanding and evaluating the services provided by SIMC and American Funds. Clients are expected to notify AIS Planning of any changes in their financial situation, investment objectives, or account restrictions.

Third-Party Investment Management Services

Historically, we have recommended the services of various third-party investment managers. These recommendations were made after an analysis of other investment advisers' advisory platforms with the goal of meeting the client's financial needs and objectives.

We monitor the strategies offered through third-party investment management platforms to ensure that the objectives align with clients' investment objectives and risk tolerance. By authorization incorporated in the service agreement, third-party investment management platforms are granted discretionary authority to manage assets.

All third-party investment managers that our firm recommends to its clients must either be exempt from registration or registered as investment advisers with the Securities and Exchange Commission or with the appropriate state authorities. AIS Planning will continuously monitor the performance of the third-party investment managers to ensure their performance and investment style remains aligned with the investment goals and objectives of the client.

Project-Specific Services

AIS Planning provides project-specific services that focus on the specific needs and concerns of the client. Project specific services may include giving advice on investments and investment-related matters. These services may include the identification of financial goals and objectives, collection and assessment of all relevant data, identification of financial problems and formulation of solutions, and the preparation of a financial plan with specific recommendations. The services we provide will typically focus on the following areas:

- Financial independence (retirement planning)
- Investment management
- Net worth planning
- Estate planning
- Family meetings
- Education planning
- Insurance reviews

- Tax strategy planning, review of tax returns
- Executive deferred compensation plans/pension pay-out elections
- Social Security planning
- Business consulting
- General investment and asset allocation advice

If your financial situation, goals, objectives, or needs change, you must notify us promptly.

Qualified Retirement Plan Consulting / Fiduciary Services

AIS Planning provides consulting and/or fiduciary services to qualified retirement, profit sharing, cash balance, and 401(k) plans. AIS Planning will also offer these services, where appropriate, to individuals and trusts, estates, and charitable organizations.

AIS Planning is registered as an investment advisor and represents that it is not subject to any disqualification as set forth in Employee Retirement Income Security Act of 1974 ("ERISA") Section 411. Generally, services provided under the AIS Planning's qualified retirement plan consulting and fiduciary services, include, but are not limited to:

- Assisting the Plan Administrator/Plan Sponsor in the development of an Investment Policy Statement ("IPS") that establishes the investment policies and objectives for the Plan. The Plan Administrator/Plan Sponsor shall have the ultimate responsibility and authority to adopt and amend the Plan's IPS;
- Assisting the Plan Administrator/Plan Sponsor in defining the goals and objectives for the administration of the Plan and in the Plan Administrator/Plan Sponsor's shaping the IPS to the demographics of the participant census;
- If selected to provide Section 3(21) investment advisor services under Section 4.B. herein, AIS Planning will provide non-discretionary investment advice to the Plan Administrator/Plan Sponsor about asset classes and investment alternatives available to the Plan in accordance with the Plan's investment policies and objectives. By providing non-discretionary investment advice, AIS Planning acts in the capacity of an ERISA Section 3(21) fiduciary and does NOT act in the capacity of an ERISA Section 3(38) fiduciary and, further, does not choose investment selections. AIS Planning merely provides advice and recommendations to the Plan Trustee(s) regarding Plan investment options. The Plan Administrator/Plan Sponsor shall have the final decision-making authority regarding the initial selection, retention, removal, and addition of Plan investment options. AIS Planning will assist the Plan Trustee(s) with the Plan Trustee (s') selection of a broad range of investment options consistent with ERISA Section 404(c) and the regulations thereunder;
- If selected to provide Section 3(38) investment management services under Section 4.B. herein, AIS Planning will provide discretionary investment management to the Plan Administrator/Plan Sponsor about asset classes and investment alternatives available to the Plan in accordance with the Plan's investment policies and objectives. By providing discretionary investment management, AIS Planning acts in the capacity of an ERISA Section 3(38) fiduciary, thereby making reasonable investment decisions on behalf of the Plan Trustee(s). These reasonable investment decisions shall include the initial selection, retention, removal, and addition of Plan investment options. Any selection of investment options shall be diverse and broad as well as in compliance with ERISA Section 404(c) and the regulations thereunder;

- If selected to provide Section 3(21) investment advisor services under Section 4.B. herein, AIS Planning will provide non-discretionary investment advice to the Plan Administrator/Plan Sponsor with respect to the selection of a qualified default investment alternative ("QDIA") for participants who otherwise fail to make an investment election. The Plan Administrator/Plan Sponsor acknowledges that it is responsible for determining whether the Plan should have a QDIA and deciding upon the type of investment that will serve as a QDIA (e.g., target date, fund, balanced fund, or managed account), as permitted by ERISA Section 404(c)(5) and the regulations promulgated thereunder. Once the Plan Administrator/Plan Sponsor has made that determination, AIS Planning will assist the Plan Sponsor in selecting the investments to serve as the QDIA. The Plan Administrator/Plan Sponsor retains the sole responsibility to provide all notices to participants required under ERISA Section 404(c)(5);
- If selected to provide Section 3(38) investment management services under Section 4.B. herein, AIS Planning will provide discretionary investment management to the Plan Administrator/Plan Sponsor with respect to the selection of a qualified default investment alternative ("QDIA") for participants who otherwise fail to make an investment election. As a 3(38), AIS Planning shall decide upon the type of investment that will serve as a QDIA (e.g., target date, fund, balanced fund, or managed account), as permitted by ERISA Section 404(c)(5) and the regulations promulgated thereunder. Once chosen by AIS Planning, then AIS Planning shall select the investments to serve as the QDIA. The Plan Administrator/Plan Sponsor retains the sole responsibility to provide all notices to participants required under ERISA Section 404(c)(5);
- AIS Planning will keep the Plan Administrator/Plan Sponsor informed of any search for investment managers/funds to replace or fill asset class gaps in accordance with the IPS. The Plan Administrator/Plan Sponsor shall have the final decision-making authority regarding the initial selection, retention, removal, and addition of investment options, if AIS Planning is operating as a Section 3(21) investment advisor; otherwise, as a Section 3(38) investment manager, AIS Planning shall have the final decision-making authority regarding the initial selection, retention, removal and addition of investment options;
- AIS Planning will assist the Plan Trustee(s) in the Plan Trustee('s)(s') monitoring investment options by preparing periodic investment reports that document investment performance, consistency of fund management, and conformance to the guidelines set forth in the IPS and make recommendations to maintain or remove and replace investment options; and
- AIS Planning will meet with the Plan Administrator/Plan Sponsor on a professionally reasonable periodic basis, not less than annually but not more frequently than quarterly, to discuss Plan administration reports and Plan operational issues.

AIS Planning also provides non fiduciary services to the plan. These services include, but are not limited to, Plan Support Services, Recordkeeper & Third-Party Administration Selection and monitoring, Conversion Services, Fiduciary and Non-Fiduciary Planning Services to Plan Participants and certain recordkeeping services. Each Plan's specific services will vary. However, all services will be outlined in the executed Retirement Plan Service Agreement.

Wrap Fee Programs

A wrap fee program combines asset management, advisory services, and trade execution for a single fee. We do not sponsor or manage, or participate in any wrap fee programs.

Assets Under Management

As of February 4, 2025, we manage approximately \$334,822,289 in client assets on a discretionary basis and approximately \$0 in client assets on a non-discretionary basis.

Fees and Compensation - Item 5

AIS Planning may charge, depending on your specific contract, a set-up fee, annual planning fees, project specific fees, hourly fees, or fees based on assets under advisement and/or fees based on assets managed by TPAs for its advisory services.

Initial Onboarding Process Fees

At the inception of a client relationship, AIS Planning generally charges a maximum negotiable fee of up to \$10,000, which covers the initial onboarding process. Fees are payable upon execution of the financial services agreement. The exact fee payable by the client will be clearly set forth in the executed agreement. AIS planning also reserves the right to waive the onboarding fee. AIS Planning expects to complete this service within six months. We do not require prepayment of over \$1,200, six or more months in advance.

Financial Planning Service Fees

If a client chooses our financial planning offering, AIS Planning charges a fixed fee, which generally ranges from \$200/month for lower net worth/less complex clients to \$15,000/quarter for higher net worth/more complex clients. The exact amount depends upon the complexity and scope of required services. Fixed fees are paid in arrears. The exact fee payable by the client will be clearly set forth in the executed agreement. Advisory fees may be increased from time to time by providing advance written notice to the client.

Ongoing Investment Management Fees

Ongoing investment management fees are determined based on the total amount of client assets directly under the care of AIS Planning. Fees are charged quarterly or monthly in arrears, based on the account balance at the end of the billing period as indicated in each client's service agreement. The fee for accounts custodied at American Funds will be calculated based on the average daily balance of the account. Fees are only changed upon written notification to the client. The maximum fee is 1.00% per year, and is negotiable depending on the size and complexity of the client's accounts, services required, and historically grandfathered fee schedules. The specific fee schedule is established in the client's agreement with the firm. Advisory fees shall apply to cash balances unless agreed otherwise.

Third-Party Investment Management Services Fees

AIS Planning shares in the fee paid to the third-party investment managers. The management fee is disclosed in the third-party investment manager's disclosure documents. These fees may or may not be negotiable. AIS Planning's compensation may differ depending upon the firm's individual agreement with each third-party investment manager. AIS Planning or its Associated Persons may have an incentive to recommend one third-party investment manager over another with whom it has less favorable compensation arrangements or other advisory programs offered by third-party investment managers with which it has no compensation arrangements.

Project-Specific Services Fees

Project-specific fees are quoted based on the time, scope, and complexity of the project. Our minimum engagement fee is \$300/hour, with a minimum of \$1,800. The total fee is based on the estimated time required to provide the contracted services and billed incrementally based on agreed upon deliverables. AIS Planning is responsible for notifying you in advance if/when estimated project fees are expected to be exceeded due to changes in time, scope and/or complexity of the project.

Qualified Retirement Plan Services

AIS Planning charges the following fees for Qualified Retirement Plan Services:

Initial onboarding fee: Up to \$1,000

Minimum fiduciary services fee:

- \$7,500 for 3(21) fiduciary services
- \$15,000 for 3(38) fiduciary service

The Plan can select one of the 3 payment options listed below:

1. Monthly deduction via signed ACH payment authorization form to the Plan Sponsor
2. Quarterly deduction via signed ACH payment authorization form to the Plan Sponsor
3. Monthly payment in arrears through investment custodian to the Plan participants

Plan Assets Fee's payable as follows:

Monthly or Quarterly in Arrears through Investment Custodian to the Plan Participants. Per AUA Fee Schedules below.

Plan Asset Balance	3(21) Fiduciary Annual Fee %	3(38) Fiduciary Annual Fee %
\$0 - \$1,000,000	0.75%	0.90%
\$1,000,001 - \$2,500,000	0.68%	0.82%
\$2,500,001 - \$5,000,000	0.60%	0.72%
\$5,000,001 - \$10,000,000	0.55%	0.66%
\$10,000,001 - \$25,000,000	0.45%	0.54%
\$25,000,001 - \$50,000,000	0.35%	0.42%
\$50,000,001 and up	negotiated	negotiated

Fiduciary Advisory Participant Services: The fee is 20 basis points on the total Plan assets and is paid to AIS Planning directly out of the Plan assets. These fees are allocated among participants' individual accounts in proportion to each account balance as indicated by the Retirement Plan Service Agreement.

For purposes of determining and calculating Fees, the market value of Plan assets means the average value of assets as reported by the recordkeeper/investment custodian over each month's time. Note that AIS Planning will not charge more than is reasonable for its services. Any fees based on the Plan's monthly average value of assets shall be charged within the first five (5) days after the end of the previous month or quarter, as further indicated below. Other fees and fee payment arrangement can be negotiated on a case by case basis. However, such fees and payment arrangements will be outlined in the Retirement Plan Service Agreement.

IRA Rollover Considerations

In conjunction with the advisory services offered, we may provide education or recommendations related to the rollover of an employer sponsored retirement plan. A plan participant leaving employment has several options. Each choice offers advantages and disadvantages, depending on desired investment options and services, fees and expenses, withdrawal options, required minimum distributions, tax treatment, and the investor's unique financial needs and retirement plans. The complexity of these choices may lead an investor to seek assistance from us.

When our firm or our Associated Person(s) recommend an investor roll over plan assets into an Individual Retirement Account ("IRA"), we and our Associated Person(s) may earn an asset-based fee as a result. However, no compensation is received if assets are retained in the plan. Thus, we have an economic incentive to encourage an investor to roll plan assets into an IRA. In most cases, your fees and expenses will increase because fees will apply to assets rolled over to an IRA and ongoing services will be extended to these assets.

Further, you may incur other levels of fees and expenses, including, but not limited to, investment-related expenses imposed by other service providers and mutual fund managers not affiliated with us, as well as other fees and expenses charged by the custodian, third-party administrator, and/or record-keeper. We make no representations or warranties relating to any costs or expenses associated with the services provided by any third parties, and you understand that these fees are in addition to the fee paid to us for the rollover advice.

In cases where we provide you with rollover advice as defined by the Department of Labor, which may also include setting up and/or completing the rollover transaction, we do not serve as a custodian, and we do not provide legal or tax advice to you. In addition, we do not have any responsibilities or potential liabilities in connection with assets not related to the rollover and investments that are not managed by us.

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries. As such, we must act in your best interest, and we must not put our interests ahead of your interests. Additionally, we must: meet a professional standard of care when making investment recommendations (give prudent advice); never put our financial interests ahead of yours when making recommendations (give loyal advice); avoid misleading statements about conflicts of interest, fees, and investments; follow policies, and procedures designed to ensure that we give advice that is in your best interest; charge no more than is reasonable for our services; and give you basic information about any conflicts of interest.

We rely on all information you provide to us, whether financial or otherwise, without independent verification. We request that you promptly notify us in writing of any material change in the financial and other information provided to us, and to promptly provide any such additional information as may be reasonably requested by us.

Due to the volatile and unpredictable nature of financial markets, we do not guarantee any future performance, any specific level of performance, or the success of any recommendations or strategies that we may take or recommend for you, or the success of our overall recommendations. Investment

recommendations are subject to various market, currency, economic, political, and business risks, and that investment decisions will not always be profitable.

Additional Fees and Expenses

Fees are charged as described above and are not based on a share of capital gains in the account of an advisory client.

Negotiability of Fees: We allow Associated Persons servicing the account to negotiate the exact investment management fees within the range disclosed in our Form ADV Part 2A Brochure. As a result, the Associated Person servicing your account may charge more or less for the same service than another Associated Person of our firm. Further, our annual investment management fee may be higher than that charged by other investment advisors offering similar services/programs.

Billing on Cash Positions: The firm treats cash and cash equivalents as an asset class. Accordingly, unless otherwise agreed in writing, all cash and cash equivalent positions (e.g., money market funds, etc.) are included as part of assets under management. At any specific point in time, depending upon perceived or anticipated market conditions/events (there being no guarantee that such anticipated market conditions/events will occur), the firm may maintain cash and/or cash equivalent positions for defensive, liquidity, or other purposes. While assets are maintained in cash or cash equivalents, such amounts could miss market advances and, depending upon current yields, at any point in time, the firm's advisory fee could exceed the interest paid by the client's cash or cash equivalent positions.

Periods of Portfolio Inactivity: The firm has a fiduciary duty to provide services consistent with the client's best interest. As part of its investment advisory services, the firm will review client portfolios on an ongoing basis to determine if any changes are necessary based upon various factors, including but not limited to investment performance, fund manager tenure, style drift, account additions/withdrawals, the client's financial circumstances, and changes in the client's investment objectives. Based upon these and other factors, there may be extended periods of time when the firm determines that changes to a client's portfolio are neither necessary nor prudent. Notwithstanding, unless otherwise agreed in writing, the firm's annual investment advisory fee will continue to apply during these periods, and there can be no assurance that investment decisions made by the firm will be profitable or equal any specific performance level(s).

All fees paid to AIS Planning for portfolio management services are separate and distinct from the fees and expenses charged by mutual funds or exchange traded funds to their shareholders. These fees and expenses are described in each fund's prospectus and generally include a management fee, other fund expenses, and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge.

A client could invest in a mutual fund or security directly, without the services of AIS Planning. In that case, the client would not receive the services provided by AIS Planning which are designed, among other things, to assist in determining which investments are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and the fees charged by AIS Planning to fully understand the total amount of fees to be paid by the client and to thereby evaluate the management services provided.

AIS Planning generally recommends no-load mutual funds to client. The funds are sold without a commission or sales charge. The reason for this is that the shares are distributed directly by the investment company instead of going through a secondary party. This is the opposite of a load fund, which charges a commission at the time of the fund's purchase, at the time of its sale, or for as long as the investor holds the fund.

Advisory recommendations are based on your financial situation and information disclosed to us at the time the services are provided. We make certain assumptions with respect to interest and inflation rates and the use of past trends and performance of the market and economy. Past performance is in no way an indication of future performance. As your financial situation, goals, objectives, or needs change, you must notify us promptly.

Either party may terminate the Agreement by written notice to the other. In the event the client terminates AIS Planning's consulting services, the balance of prepaid unearned fees (if any) shall be refunded to the client.

Sales Compensation

AIS Planning is a licensed insurance agency and certain of our Associated Persons are licensed insurance agents. AIS Planning and our dually licensed Associated Persons can affect transactions in insurance products and earn commission-based compensation for these activities. Clients are instructed that the fees paid to the firm for advisory services are separate and distinct from the commissions earned by us and our dually licensed Associated Persons. Commissions from the sale of insurance products will not be used to offset or credited against advisory fees.

The sale of annuity contracts or insurance products offered by Associated Persons are intended to complement AIS Planning's advisory services. However, a conflict of interest exists due to the receipt of dual forms of compensation because Associated Persons have an incentive to recommend insurance products based on the compensation to be received, rather than on a client's needs. We address this conflict of interest by recommending insurance products only where we, in good faith, believe that it is appropriate for the client's particular needs and circumstances and only after a full presentation of the recommended insurance product to our client. In addition, we explain the insurance underwriting process to our clients to illustrate how the insurer also reviews the client's application and disclosures prior to the issuance of a resulting insuring agreement. Clients to whom the firm offers advisory services are informed that they are under no obligation to purchase insurance services. Clients who do choose to purchase insurance services are under no obligation to use our licensed Associated Persons and may use the insurance brokerage firm and agent of their choice.

Where fixed annuities are sold, clients should also note that the annuity sales result in substantial up-front commissions and ongoing trails based on the annuity's total value. In addition, many annuities contain surrender charges and/or restrictions on access to your funds. Payments and withdrawals can have tax consequences. Optional lifetime income benefit riders are used to calculate lifetime payments only and are not available for cash surrender or in a death benefit unless specified in the annuity contract. In some annuity products, fees can apply when using an income rider. Annuity guarantees are based on the financial strength and claims-paying ability of the issuing insurance company. We urge our clients to read all insurance contract disclosures carefully before making a purchase decision. Rates and returns mentioned on any program presented are subject to change without notice. Insurance products are subject to fees and additional expenses.

We strive to identify all potential and actual conflicts of interest between you, our firm, and our Associated Persons in this Disclosure Brochure. If additional conflicts arise in the future, we will notify you in writing and/or provide you an updated Disclosure Brochure.

Any material conflicts of interest between you and our firm, and the Associated Persons of our firm, are outlined in this Brochure. If additional material conflicts arise in the future, we will notify you in writing or supply you with an updated Brochure.

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

Performance-based fees are based on a share of capital gains on or capital appreciation of the client's assets. AIS Planning and its Associated Persons do not accept performance-based fees.

Types of Clients - Item 7

We offer investment advisory services to individuals, qualified retirement and profit-sharing plans, trusts, estates, charitable organizations, corporations, and other business entities.

We have a minimum annual fee requirement inclusive of all Management Fees, Fixed Fees, and Onboarding Fees. The minimum fee shall be no less than \$2,500 per year. However, AIS Planning reserves the right to waive or lower this minimum.

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

Asset allocation models used by the sub advisers and/or other third-party investment managers (listed under Item 4 above) are developed in accordance with investment programs developed by these entities. Clients should refer to the relevant sub advisers' and/or third-party investment manager's Form ADV Part 2 Brochures or comparable disclosure documents for more information about the methods of analysis and investment strategies used by those firms. As disclosed above, AIS Planning will assist clients in selecting third-party investment managers whose investment programs and strategies have been reviewed by AIS Planning and determined appropriate for AIS Planning's clients based on their individual circumstances and investment goals. We also obtain research from various third-party research providers and subscription services.

The following are different methods of analysis that we may use when providing you with investment advice:

- Fundamental analysis is a method of evaluating a company or security by attempting to measure its intrinsic value. In other words, trying to determine a company's or a security's true value by looking at all aspects of the business, including both tangible factors (e.g.,

machinery buildings, land, etc.) and intangible factors (e.g., patents, trademarks, "brand" names, etc.). Fundamental analysis also involves examining related economic factors (e.g., overall economy and industry conditions, etc.), financial factors (e.g., company debt, interest rates, management salaries and bonuses, etc.), qualitative factors (e.g., management expertise, industry cycles, labor relations, etc.), and quantitative factors (e.g., debt-to-equity and price-to-equity ratios). The end goal of performing fundamental analysis is to produce a value that an investor can compare with the security's current price in hopes of determining what sort of position to take with that security (underpriced = buy, overpriced = sell or short). This method of security analysis is considered the opposite of technical analysis. Fundamental analysis is about using real data to evaluate a security's value. Although most analysts use fundamental analysis to value stocks, this method of valuation can be used for just about any type of security.

- Technical analysis is a technique that relies on the assumption that current market data (such as charts of price, volume, and open interest) can help predict future market trends, at least in the short term. It assumes that market psychology influences trading and can predict when stocks will rise or fall. Technical trading models are mathematically driven based upon historical data and trends of domestic and foreign market trading activity, including various industry and sector trading statistics within such markets. Technical trading models, through mathematical algorithms, attempt to identify when markets are likely to increase or decrease and identify appropriate entry and exit points. The primary risk of technical trading models is that historical trends and past performance cannot predict future trends, and there is no assurance that the mathematical algorithms employed are designed properly, updated with new data, and can accurately predict future market, industry, and sector performance.

Our firm, the sub-advisers and/or other third-party investment managers managing your account, may use one or more of the following investment strategies when advising you on investments:

- *Long Term Purchases* – securities purchased with the expectation that the value of those securities will grow over a relatively long period, generally greater than one year. Using a long-term purchase strategy generally assumes the financial markets will go up in the long-term which may not be the case. There is also the risk that the segment of the market that you are invested in or perhaps just your particular investment will go down over time even if the overall financial markets advance. Purchasing investments long-term may create an opportunity cost - "locking-up" assets that may be better utilized in the short-term in other investments.
- *Short Term Purchases* – securities purchased with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the securities' short-term price fluctuations. Using a short-term purchase strategy generally assumes that we can predict how financial markets will perform in the short-term which may be very difficult and will incur a disproportionately higher amount of transaction costs compared to long-term trading. There are many factors that can affect financial market performance in the short-term (such as short-term interest rate changes, cyclical earnings announcements, etc.), but they may have a smaller impact over longer periods.
- *Trading* – securities are sold within 30 days. The principal type of risk associated with trading is market risk. There can be no assurance that a specific investment will achieve its investment objectives and past performance should not be seen as a guide to future returns.

The value of investments and the income derived may fall as well as rise and investors may not recoup the original amount invested. Other factors, such as changes in exchange control regulation, tax laws, withholding taxes, international, political and economic developments, and government, economic or monetary policies, may affect investments as well. Additionally, trading is speculative. Market movements are difficult to predict and are influenced by, among other things, government trade, fiscal, monetary and exchange control programs and policies; changing supply and demand relationships; national and international political and economic events; changes in interest rates; and the inherent volatility of the marketplace. In addition, governments from time to time intervene, directly and by regulation, in certain markets, often with the intent to influence prices directly. The effects of governmental intervention may be particularly significant at certain times in the financial instrument markets and such intervention (as well as other factors) may cause these markets to move rapidly.

- **Margin Transactions** – margin strategies allow an investor to purchase securities on credit and to borrow on securities already in their custodial account. Interest is charged on any borrowed funds for the period that the loan is outstanding. When you purchase securities, you may pay for the securities in full or you may borrow part of the purchase price from your broker-dealer. If you intend to borrow funds in connection with your account, you will be required to open a margin account, which will be carried by the broker-dealer of your account. The securities purchased in such an account are the broker-dealer's collateral for its loan to you. If the securities in a margin account decline in value, the value of the collateral supporting this loan also declines, and, as a result, a brokerage firm is required to take action, such as issue a margin call and/or sell securities or other assets in your accounts, in order to maintain necessary level of equity in the account. It is important that you fully understand the risks involved in obtaining loans or trading securities on margin. These risks are applicable to any margin account that you may maintain, including any margin account that may be established as a part of our advisory services and held by your custodian and/or broker-dealer. These risks include the following:
 1. You can lose more funds than you deposit in your margin account.
 2. The custodian and/or broker-dealer can force the sale of securities or other assets in your account.
 3. The custodian and/or broker-dealer can sell your securities or other assets without contacting you.
 4. You may not be able to choose which securities or other assets in your margin account are liquidated or sold to meet a margin call.
 5. The custodian and/or broker-dealer may move securities held in your cash account to your margin account and pledge the transferred securities.
 6. You may not be entitled to an extension of time on a margin call.

The advice provided by AIS Planning will vary depending on each client's specific financial situation and goals. This brief statement does not disclose all of the risks and other significant aspects of investing in financial markets. In light of the risks, you should fully understand the nature of the contractual relationships into which you are entering and the extent of your exposure to risk. Certain investing strategies may not be suitable for everyone. You should carefully consider whether the strategies employed would be appropriate for you in light of your experience, objectives, financial resources and other relevant circumstances.

General Investment Risk: All investments come with the risk of losing money. Investing involves substantial risks, including complete possible loss of principal plus other losses. Investments, unlike savings and checking accounts at a bank, are not insured by the government to protect against market losses. Different market instruments carry different types and degrees of risk and you should familiarize yourself with the risks involved in the particular market instruments you intend to invest in.

Loss of Value: There can be no assurance that a specific investment will achieve its investment objectives and past performance should not be seen as a guide to future returns. The value of investments and the income derived may fall as well as rise and investors may not recoup the original amount invested. Investments may also be affected by any changes in exchange control regulation, tax laws, withholding taxes, international, political and economic developments, and government, economic or monetary policies.

Interest Rate Risk: Fixed income securities and funds that invest in bonds and other fixed income securities may fall in value if interest rates change. Generally, the prices of debt securities rise when interest rates fall, and their prices fall when interest rates rise. Longer-term debt securities are usually more sensitive to interest rate changes.

Credit Risk: Investments in bonds and other fixed income securities are subject to the risk that the issuer(s) may not make required interest payments. An issuer suffering an adverse change in its financial condition could lower the credit quality of a security, leading to greater price volatility of the security. A lowering of the credit rating of a security may also offset the security's liquidity, making it more difficult to sell. Funds investing in lower quality debt securities are more susceptible to these problems and their value may be more volatile.

Foreign Exchange Risk: Foreign investments may be affected favorably or unfavorably by exchange control regulations or changes in the exchange rates. Changes in currency exchange rates may influence the share value, the dividends or interest earned and the gains and losses realized. Exchange rates between currencies are determined by supply and demand in the currency exchange markets, the international balance of payments, governmental intervention, speculation, and other economic and political conditions. If the currency in which a security is denominated appreciates against the U.S. Dollar, the value of the security will increase. Conversely, a decline in the exchange rate of the currency would adversely affect the value of the security.

Risks Associated with Investing in Equities: Investments in equities generally refers to buying shares of stocks by an individual or firms in return for receiving a future payment of dividends and capital gains if the value of the stock increases. There is an innate risk involved when purchasing a stock that it may decrease in value and the investment may incur a loss.

Recommendation of Particular Types of Securities: As disclosed under the Advisory Business section in this brochure, we recommend all types of securities and we do not necessarily recommend one particular type of security over another since each client has different needs and different tolerance for risk. Each type of security has its own unique set of risks associated with it and it would not be possible to list here all of the specific risks of every type of investment. Even within the same type of investment, risks can vary widely. However, in very general terms, the higher the anticipated return of an investment, the higher the risk of loss associated with that investment.

Concentrated Position Risk: Certain Associated Persons may recommend that clients concentrate account assets in an industry or economic sector. In addition to the potential concentration of accounts in one or more sectors, certain accounts may, or may be advised to, hold concentrated positions in specific securities. Therefore, at times, an account may, or may be advised to, hold a relatively small number of securities positions, each representing a relatively large portion of assets in the account. As a result, the account will be subject to greater volatility than a more sector-diversified portfolio. Investments in issuers within an industry or economic sector that experiences adverse economic, business, political conditions or other concerns will impact the value of such a portfolio more than if the portfolio's investments were not so concentrated. A change in the value of a single investment within the portfolio will affect the overall value of the portfolio and will cause greater losses than it would in a portfolio that holds more diversified investments.

Preferred Securities Risk: Preferred securities have similar characteristics to bonds in that preferred securities are designed to make fixed payments based on a percentage of their par value and are senior to common stock. Like bonds, the market value of preferred securities is sensitive to changes in interest rates as well as changes in issuer credit quality. Preferred securities, however, are junior to bonds with regard to the distribution of corporate earnings and liquidation in the event of bankruptcy. Preferred securities that are in the form of preferred stock also differ from bonds in that dividends on preferred stock must be declared by the issuer's board of directors, whereas interest payments on bonds generally do not require action by the issuer's board of directors, and bondholders generally have protections that preferred stockholders do not have, such as indentures that are designed to guarantee payments – subject to the credit quality of the issuer – with terms and conditions for the benefit of bondholders. In contrast preferred stocks generally pay dividends, not interest payments, which can be deferred or stopped in the event of credit stress without triggering bankruptcy or default. Another difference is that preferred dividends are paid from the after-tax profits, while bond interest is paid before taxes.

Risks Associated with Investing in Mutual Funds: Mutual funds are professionally managed collective investment systems that pool money from many investors and invest in stocks, bonds, short-term money market instruments, other mutual funds, other securities, or any combination thereof. The fund will have a manager that trades the fund's investments in accordance with the fund's investment objective. While mutual funds generally provide diversification, risks can be significantly increased if the fund is concentrated in a particular sector of the market, primarily invests in small cap or speculative companies, uses leverage (i.e., borrows money) to a significant degree, or concentrates in a particular type of security (i.e., equities) rather than balancing the fund with different types of securities. The returns on mutual funds can be reduced by the costs to manage the funds. In addition, while some mutual funds are "no load" and charge no fee to buy into, or sell out of, other types of mutual funds do charge such fees which can also reduce returns.

Risks Associated with Investing in Exchange Traded Funds (ETF): Investing in stocks & ETF's carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Investments in these securities are not guaranteed or insured by the FDIC or any other government agency. Detailed information about the risks associated with each ETF is provided in the relevant ETF's prospectus. Below are some specific risks related to the ETFs recommended by our firm:

- **Leveraged and Inverse ETF Risk:** A leveraged ETF generally seeks to deliver multiples of the daily performance of the index or benchmark that it tracks. An inverse ETF generally seeks to deliver the opposite of the daily performance of the index or benchmark that it tracks. Inverse ETFs often are marketed as a way for investors to profit from, or at least hedge their exposure to, downward-moving markets. Some ETFs are both inverse and leveraged, meaning that they seek a return that is a multiple of the inverse performance of the underlying index. To accomplish their objectives, leveraged and inverse ETFs use a range of investment strategies, including swaps, futures contracts and other derivative instruments. Leveraged, inverse, and leveraged inverse ETFs are more volatile and riskier than traditional ETFs due to their exposure to leverage and derivatives, particularly total return swaps and futures. At times, we will recommend leveraged and/or inversed ETFs, which may amplify gains and losses.

Most leveraged ETFs are typically designed to achieve their desired exposure on a daily (in a few cases, monthly) basis, and reset their leverage daily. A "single day" is measured from the time the leveraged ETF calculates its net asset value ("NAV") to the time of the leveraged ETF's next NAV calculation. The return of the leveraged ETF for periods longer than a single day will be the result of each day's returns compounded over the period. Due to the effect of this mathematical compounding, their performance over longer periods of time can differ significantly from the performance (or inverse performance) of their underlying index or benchmark during the same period of time. For periods longer than a single day, the leveraged ETF will lose money when the level of the Index is flat, and it is possible that the leveraged ETF will lose money even if the level of the Index rises. Longer holding periods, higher index volatility and greater leverage all exacerbate the impact of compounding on an investor's returns. During periods of higher Index volatility, the volatility of the Index may affect the leveraged ETF's return as much as or more than the return of the Index itself. Therefore, holding leveraged, inverse, and leveraged inverse ETFs for longer periods of time increases their risk due to the effects of compounding and the inherent difficulty in market timing. Leveraged ETFs are riskier than similarly benchmarked ETFs that do not use leverage. Non-traditional ETFs are volatile and not suitable for all investors. Positions in nontraditional ETFs should be monitored closely due to their volatile nature and inability to track the underlying index over an extended period of time. Clients should carefully read the prospectus for a leveraged and inverse ETF to fully understand the cost structures, risks and features of these complex products.

- **Buffer ETFs:** Buffer ETFs are also known as defined-outcome ETFs, since the ETF is designed to offer downside protection for a specified period of time. These ETFs are modeled after options-based structured notes, but are generally cheaper, and offer more liquidity. Buffer ETFs are designed to safeguard against market downturns by employing complex options strategies. Buffer ETFs typically charge higher management fees that are considerably more than the index funds whose performance they attempt to track. Additionally, because buffer funds own options, they do not receive dividends from their equity holdings. Both factors result in the underperformance of the Buffer ETF compared to the index they attempt to track. Clients should carefully read the prospectus for a buffer ETF to fully understand the cost structures, risks and features of these complex products.

Environment, Social and Governance Investment Criteria Risk: If a portfolio is subject to certain environmental, social and governance (ESG) investment criteria it may avoid purchasing certain securities for ESG reasons when it is otherwise economically advantageous to purchase those securities, or may sell certain securities for ESG reasons when it is otherwise economically advantageous to hold those securities. In general, the application of portfolio's ESG investment criteria may affect the portfolio's exposure to certain issuers, industries, sectors and geographic areas, which may affect the financial performance of the portfolio, positively or negatively, depending on whether these issuers, industries, sectors or geographic areas are in or out of favor. An adviser or vendor can vary materially from other ESG advisers and vendors with respect to its methodology for constructing ESG portfolios or screens, including with respect to the factors and data that it collects and evaluates as part of its process. As a result, an adviser's or vendor's ESG portfolio or screen may materially differ from or contradict the conclusions reached by other ESG advisers or vendors with respect to the same issuers. Further, ESG criteria is dependent on data and is subject to the risk that such data reported by issuers or received from third party sources may be subjective, or may be objective in principal but not verified or reliable.

Cybersecurity Risks: Our firm and our service providers are subject to risks associated with a breach in cybersecurity. Cybersecurity is a generic term used to describe the technology, processes, and practices designed to protect networks, systems, computers, programs, and data from cyber-attacks and hacking by other computer users, and to avoid the resulting damage and disruption of hardware and software systems, loss or corruption of data, and/or misappropriation of confidential information.

In general, cyber-attacks are deliberate; however, unintentional events may have similar effects. Cyber-attacks may cause losses to clients by interfering with the processing of transactions, affecting the ability to calculate net asset value or impeding or sabotaging trading. Clients may also incur substantial costs as the result of a cybersecurity breach, including those associated with forensic analysis of the origin and scope of the breach, increased and upgraded cybersecurity, identity theft, unauthorized use of proprietary information, litigation, and the dissemination of confidential and proprietary information. Any such breach could expose our firm to civil liability as well as regulatory inquiry and/or action. In addition, clients could be exposed to additional losses as a result of unauthorized use of their personal information.

While our firm has established a business continuity plan and systems designed to prevent cyber-attacks, there are inherent limitations in such plans and systems, including the possibility that certain risks have not been identified. Similar types of cybersecurity risks are also present for issuers of securities, investment companies and other investment advisers in which we invest, which could result in material adverse consequences for such entities and may cause a client's investment in such entities to lose value.

Pandemic Risk: Large-scale outbreaks of infectious disease can greatly increase morbidity and mortality over a wide geographic area, crossing international boundaries, and causing significant economic, social, and political disruption. It is difficult to predict the long-term impact of such events because they are dependent on a variety of factors including the global response of regulators and governments to address and mitigate the worldwide effects of such events. Workforce reductions, travel restrictions, governmental responses and policies and macroeconomic factors will negatively impact investment returns.

Recommendation of Other Advisers: In the event we recommend a third-party investment adviser to manage all or a portion of your assets, we will advise you on how to allocate your assets among various classes of securities or third-party investment managers, programs, or managed model portfolios. As such, we will primarily rely on investment model portfolios and strategies developed by the third-party investment advisers and their portfolio managers. If there is a significant deviation in characteristics or performance from the stated strategy and/or benchmark, we may recommend changing models or replacing a third-party investment adviser.

The primary risk-associated with investing with a third party is that, while a particular third party may have demonstrated a certain level of success in the past, it may not be able to replicate that success in future markets. In addition, as we do not control the underlying investments in third party model portfolios, there is also a risk that a third party may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for our clients. To mitigate this risk, we seek third parties with proven track records that have demonstrated a consistent level of performance and success over time.

A third party's past performance is not a guarantee of future results and certain market and economic risks exist that may adversely affect an account's performance that could result in capital losses in your account. Please refer to the third-party investment adviser's advisory agreements, Form ADV Brochure, and associated disclosure documents for details on their specific investment strategies, methods of analysis, and associated risks.

Cryptocurrency Risk: Cryptocurrency (e.g., bitcoin and ether), often referred to as "virtual currency", "digital currency", or "digital assets", is designed to act as a medium of exchange. Cryptocurrency is an emerging asset class. There are thousands of cryptocurrencies, the most well-known of which is bitcoin. Certain of the firm's clients may have exposure to bitcoin or another cryptocurrency, directly or indirectly through an investment such as an ETF or other investment vehicles.

Cryptocurrency operates without central authority or banks and is not backed by any government. Cryptocurrencies may experience very high volatility and related investment vehicles may be affected by such volatility. As a result of holding cryptocurrency, certain of the firm's clients may also trade at a significant premium or discount to NAV. Cryptocurrency is also not legal tender. Federal, state or foreign governments may restrict the use and exchange of cryptocurrency, and regulation in the U.S. is still developing. The market price of many cryptocurrencies, including bitcoin, has been subject to extreme fluctuations. If cryptocurrency markets continue to be subject to sharp fluctuations, investors may experience losses if the value of the client's investments decline. Similar to fiat currencies (i.e., a currency that is backed by a central bank or a national, supra-national or quasi-national organization), cryptocurrencies are susceptible to theft, loss and destruction. Cryptocurrency exchanges and other trading venues on which cryptocurrencies trade are relatively new and, in most cases, largely unregulated and may therefore be more exposed to fraud and failure than established, regulated exchanges for securities, derivatives and other currencies. The SEC has issued a public report stating U.S. federal securities laws require treating some digital assets as securities.

Cryptocurrency exchanges may stop operating or permanently shut down due to fraud, technical glitches, hackers or malware. Due to relatively recent launches, most cryptocurrencies have a limited trading history, making it difficult for investors to evaluate investments. Generally, cryptocurrency

transactions are irreversible such that an improper transfer can only be undone by the receiver of the cryptocurrency agreeing to return the cryptocurrency to the original sender. Digital assets are highly dependent on their developers and there is no guarantee that development will continue or that developers will not abandon a project with little or no notice. Third parties may assert intellectual property claims relating to the holding and transfer of digital assets, including cryptocurrencies and their source code. Any threatened action that reduces confidence in a network's long-term ability to hold and transfer cryptocurrency may affect investments in cryptocurrencies.

Many significant aspects of the U.S. federal income tax treatment of investments in cryptocurrency are uncertain and an investment in cryptocurrency may produce income that is not treated as qualifying income for purposes of the income test applicable to regulated investment companies. Certain cryptocurrency investments may be treated as a grantor trust for U.S. federal income tax purposes, and an investment by the firm's clients in such a vehicle will generally be treated as a direct investment in cryptocurrency for tax purposes and "flow-through" to the underlying investors.

Disciplinary Information - Item 9

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of us or the integrity of our management. There is no history of reportable material legal or disciplinary events by our firm, our management, or advisory representatives.

Other Financial Industry Activities or Affiliations - Item 10

AIS Planning is a licensed insurance agency that sells fixed insurance products. Cathy L. Juilfs, President/CEO, Jason C Hallonquist, Senior Advisor, and other Associated Persons of AIS Planning, are licensed insurance agents and can affect transactions in various insurance products, including life, health, disability, long-term care, and annuities, among others. These individuals earn commissions for these activities. The sale of annuity contracts or insurance products offered by Associated Persons are intended to complement AIS Planning's advisory services. However, a conflict of interest exists due to the receipt of dual forms of compensation because Associated Persons have an incentive to recommend insurance products based on the compensation to be received, rather than on a client's needs. AIS Planning has policies and procedures in place to monitor all client transactions and all client transaction costs will be disclosed to the client. Clients to whom the firm offers advisory services are informed that they are under no obligation to use the firm's Associated Persons for insurance services and may use the insurance brokerage firm and agent of their choice.

Where AIS Planning finds an Associated Person has not acted in the best interest of the client, AIS Planning may cancel the transaction. Alternatively, AIS Planning may deduct the commission costs from the advisory fee paid by the client. In any event, all client transaction costs will be disclosed to the client.

Ms. Juilfs & Mr. Hallonquist spend less than 1% of their time in their capacities as insurance agents.

Recommendation of third-party investment managers

Historically, we have recommended the services of various third-party investment managers as part of our asset allocation and investment strategy. AIS Planning shares in the compensation received by the third-party investment manager for managing your account. The compensation arrangement presents a conflict of interest due to a financial incentive to recommend the services of the third-party investment manager based on the compensation received. You are not required to use the services of any third-party investment manager we recommend.

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

AIS Planning has adopted a Code of Ethics (the “Code”) to address investment advisory conduct. The Code focuses primarily on fiduciary duty, personal securities transactions, insider trading, gifts, and conflicts of interest. The Code includes AIS Planning’s policies and procedures developed to protect clients’ interests in relation to the following topics:

- The duty at all times to place the interests of clients first;
- The requirement that all personal securities transactions be conducted in such a manner that is consistent with the Code of Ethics;
- The responsibility to avoid any actual or potential conflict of interest or misuse of an employee’s position of trust and responsibility;
- The fiduciary principle that information concerning the identity of security holdings and financial circumstances of clients is confidential; and
- The principle that independence in the investment decision-making process is paramount.

You can request a copy of our Code of Ethics by calling us at (320) 252-6552 or mailing a request to our principal office.

Personal Trading Practices

At times, AIS Planning and/or its Associated Persons may take positions in the same securities as clients, which may pose a conflict of interest with clients. AIS Planning and its Associated Persons will generally be “last in” and “last out” for the trading day when trading occurs in close proximity to client trades. We will not violate our fiduciary responsibilities to our clients. Front running (trading shortly ahead of clients) is prohibited. Should a conflict occur because of materiality (i.e., a thinly traded stock), disclosure will be made to the client(s) at the time of trading. Incidental trading not deemed to be a conflict (i.e., a purchase or sale which is minimal in relation to the total outstanding value, and as such would have negligible effect on the market price) would not be disclosed at the time of trading.

Brokerage Practices – Item 12

Suggestion of Broker

Clients invested through the various programs developed by SEI Investments Management Corporation ("SIMC"), are required to custody accounts with SEI Trust Company, ("SEI"), a wholly owned subsidiary of SEI Investments. SEI is a federally registered thrift institution. Trades executed through SEI for SEI funds are placed free of charge, as an accommodation to clients. However, accounts may be subject to an annual custodial fee of up to \$1,000. The exact fee will be listed in SEI's account opening document. Clients invested in the American Funds Program are required to custody accounts with American Funds.

All brokerage commissions, custodial fees and service charges, stock transfer fees, and other similar charges incurred in connection with transactions for a client's account will be paid out of the assets in a client's account or billed separately to the client (by the custodian) and is in addition to the investment management fees paid to AIS Planning.

Research and Other Soft Dollar Benefits

Although not considered "soft dollar" compensation, AIS Planning may receive benefits from SEI/SIMC or American Funds such as research services, reports, software, and institutional trading support.

Best Execution

AIS Planning will diligently comply with all federal securities laws regarding "best execution" to ascertain the best markets for securities, and to buy or sell in such markets so prices to clients are as favorable as possible under prevailing market conditions.

We are bound by ERISA and the Internal Revenue Code, and as such, are committed to avoiding misleading statements about fees, investments, and services we provide, while disclosing basic information about potential conflicts of interest that may arise while providing financial planning services.

AIS Planning understands its duty for best execution and considers all factors in making recommendations to its clients. These research services may be useful in servicing all AIS Planning clients, and may not be used in connection with any particular account that may have paid compensation to the firm in providing such services. While AIS Planning may not always obtain the lowest commission rate, AIS Planning believes the rate is reasonable in relation to the value of the brokerage and research services provided.

Brokerage for Client Referrals

AIS Planning does not receive client referrals from broker-dealers and custodians in which we have an institutional advisory arrangement. Also, we do not receive other benefits from a broker-dealer in exchange for client referrals.

Directed Brokerage

Clients invested through the various programs developed by SIMC are required to custody accounts with SEI and clients invested in the American Funds Program are required to custody accounts with American Funds. The client may direct brokerage to a specified broker-dealer other than the firm

recommended by AIS Planning. However, the client will not be able to participate in the firm's recommended investment programs.

In client directed brokerage arrangements, it is up to the client to negotiate the commission rate, as AIS Planning will not. The client may not be able to negotiate the most competitive rate and as a result, may pay more than the rate available through the custodian used by AIS Planning. In client-directed brokerage arrangements, the client may not be able to participate in aggregated ("blocked") trades, which may help reduce the cost of execution. Where the client does not otherwise designate a broker dealer, AIS Planning recommends broker dealers with competitive commission rates.

Review of Accounts - Item 13

AIS Planning will monitor your portfolio's performance on a continuous basis. Portfolio performance is reviewed, at a minimum, on a quarterly basis. AIS Planning offers portfolio management clients an in-person portfolio review meeting on an annual basis. We will also monitor the TPAs to ensure their performance and investment style remains aligned with your investment goals and objectives.

The Associated Person assigned to each client relationship will conduct a formal account review once every calendar year. The Chief Compliance Officer will oversee the Associated Persons' monitoring of portfolios and financial plans for investment objectives and other supervisory review.

A financial plan is a snapshot in time and no on-going reviews are conducted. We recommend clients engage us on an annual basis to update their financial plans.

Clients will receive statements directly from their account custodian(s) on at least a quarterly basis. Additionally, the TPA managing the client's account may provide performance reports.

Client Referrals and Other Compensation - Item 14

We do not receive economic benefits from third parties in exchange for providing investment advice or other advisory services to our clients. However, as disclosed in the Research and Other Soft Dollar Benefits section above, we receive research and other benefits from SEI and SIMC.

Economic Benefits Received from Vendors and Product Sponsors

Occasionally, our firm and our Associated Persons will receive additional compensation from vendors. Compensation could include such items as gifts; an occasional dinner or ticket to a sporting event; reimbursement in connection with educational meetings with an Associated Person, reimbursement for consulting services, client workshops, or events; or marketing events or advertising initiatives, including services for identifying prospective clients. Receipt of additional economic benefits presents a conflict of interest because our firm and Associated Persons have an incentive to recommend and use vendors based on the additional economic benefits obtained rather than solely on the client's needs. We address this conflict of interest by recommending vendors that we, in good faith, believe

are appropriate for the client's particular needs. Clients are under no obligation contractually or otherwise, to use any of the vendors recommended by us.

Recommendation of third-party investment managers

Historically, we have recommended the services of various third-party investment managers as part of our asset allocation and investment strategy. AIS Planning shares in the compensation received by the third-party investment manager for managing your account. The compensation arrangement presents a conflict of interest due to a financial incentive to recommend the services of the third-party investment manager based on the compensation received. You are not required to use the services of any third-party investment manager we recommend.

We and our related persons do not compensate, either directly or indirectly, any person or entity who is not our supervised person for client referrals.

Custody - Item 15

We do not have physical custody of any of your funds and/or securities. Your funds and securities will be held with a bank, broker-dealer, or other independent, qualified custodian.

In most cases, the third-party investment adviser ("TPA") calculates and deducts advisory fees directly from the client's custodial account(s) pursuant to an authorization provided by you directly to the TPA. The TPA remits a portion of the fees to AIS Planning. In such cases, AIS planning does not get involved in the fee calculation or deduction process.

Occasionally, AIS planning will directly instruct the custodian to debit your account(s) for the payment of certain advisory fees, such as fees for financial planning services. In such cases, AIS Planning is deemed to exercise custody over your funds or securities.

With respect to third party standing letters of authorization ("SLOA") where a client grants us authority to direct custodians to disburse funds to one or more third party accounts, we are deemed to have custody pursuant to Rule 206(4)-2 (the "Custody Rule"). We have taken steps to have controls and oversight in place to comply with the no-action letter issued by the SEC on February 21, 2017 (the "SEC no-action letter"). We are not required to comply with the surprise examination requirements of the Custody Rule if we are in compliance with the representations noted in the SEC no-action letter. Where our firm acts pursuant to a SLOA, we believe we are making a good faith effort to comply with the representations noted in the SEC no-action letter. Additionally, since many of the representations noted in the SEC no-action letter involve the qualified custodian's operations, we will collaborate closely with our custodian(s) to ensure that the representations are met.

You will receive account statements from the independent, qualified custodian(s) holding your funds and securities at least quarterly. The account statements from your custodian(s) will indicate the amount of our advisory fees deducted from your account(s) each billing period.

We urge our clients to review their account statements for accuracy. The custodial statement is the official record of your account for tax purposes. If you have questions about your statements, or if

you did not receive a statement from the qualified custodian, please call our office number located on the cover page of this brochure.

Investment Discretion - Item 16

Our firm offers Ongoing Investment Management services to its advisory clients on a discretionary basis. Clients must grant the firm discretionary authority in the Financial Service Agreement.

Discretionary portfolio management means we will make investment decisions and place portfolio reallocation orders in your account without contacting you prior to each transaction.

If you wish, you may limit our discretionary authority by, for example, setting a limit on the type of securities that can be purchased for your portfolio. Simply provide us with your restrictions or guidelines in writing.

Voting Client Securities - Item 17

Proxy Voting

AIS Planning will not vote proxies on behalf of client accounts, although, at the client's request, AIS Planning may offer clients advice regarding corporate actions and the exercise of proxy voting rights and/or materials.

Questions about proxies may be made via the contact information on the cover page.

Financial Information - Item 18

We are required in this Item to provide you with certain financial information or disclosures about AIS Planning's financial condition.

AIS Planning does not require the prepayment of over \$1,200 six or more months in advance. Additionally, AIS Planning has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

Requirements of State-Registered Advisers - Item 19

This section is not applicable because our firm is SEC registered.

Miscellaneous

Class Action Lawsuits

From time to time, securities held in the accounts of clients will be the subject of class action lawsuits. AIS Planning has no obligation to determine if securities held by the client are subject to a pending or resolved class action lawsuit. It also has no duty to evaluate a client's eligibility or to submit a claim to participate in the proceeds of a securities class action settlement or verdict. Furthermore, the firm has no obligation or responsibility to initiate litigation to recover damages on behalf of clients who may have been injured as a result of actions, misconduct, or negligence by corporate management of issuers whose securities are held by clients.

Where the firm receives written or electronic notice of a class action lawsuit, settlement, or verdict affecting securities owned by a client, it will forward all notices, proof of claim forms, and other materials to the client. Electronic mail is acceptable where appropriate, and if the client has authorized contact in this manner.

AIS Planning Privacy Notice

This notice is being provided to you in accordance with the Securities and Exchange Commission's rule regarding the privacy of consumer financial information ("Regulation S-P"). Please take the time to read and understand the privacy policies and procedures that we have implemented to safeguard your non-public personal information.

INFORMATION WE COLLECT

AIS Planning must collect certain personally identifiable financial information about its customers to provide financial services and products. The personally identifiable financial information that we gather during the normal course of doing business with you may include:

- information we receive from you on applications or other forms;
- information about your transactions with us, our affiliates, or others;
- information we receive from a consumer reporting agency.

INFORMATION WE DISCLOSE

We do not disclose any non-public personal information about our customers or former customers to anyone, except as permitted or required by law, as necessary to provide services to you, or if you have given us permission in writing. In accordance with Section 248.13 of Regulation S-P, we may disclose all of the information we collect, as described above, to certain non-affiliated third parties such as our attorneys, accountants, auditors, and persons or entities that are assessing our compliance with industry standards. We enter into contractual agreements with all non-affiliated third parties that prohibit such third parties from disclosing or using the information other than to carry out the purposes for which we disclose the information.

Regulation S-AM: Under Regulation S-AM, we are prohibited from using eligibility information that we receive from an affiliate to make a marketing solicitation unless: (1) the potential marketing use of that information has been clearly, conspicuously and concisely disclosed to the consumer; (2) the

consumer has been provided a reasonable opportunity and a simple method to opt out of receiving the marketing solicitations; and (3) the consumer has not opted out. We do not receive information regarding marketing eligibility from affiliates to make solicitations.

Regulation S-ID: Regulation S-ID requires our firm to have an Identity Theft Protection Program (“ITPP”) that controls reasonably foreseeable risks to customers or to the safety and soundness of our firm from identity theft. We have developed an ITPP to adequately identify and detect potential red flags to prevent and mitigate identity theft.

CONFIDENTIALITY AND SECURITY

We restrict access to non-public personal information about you to those Employees who need to know that information to provide financial products or services to you. We maintain physical, electronic, and procedural safeguards that comply with federal standards to guard your non-public personal information.

ACCURACY

AIS Planning strives to maintain accurate personal information in our client files at all times. However, as personal situations, facts and data change over time, we encourage our clients to provide feedback and updated information to help us meet our goals.