

# DISCLOSURE BROCHURE

THE INVESTMENT ADVISERS ACT OF 1940 RULE 203-1  
**Part 2A of Form ADV: Firm Brochure**



Firm IARD/CRD #: 129489

**CrossPlan Money Management**  
REGISTERED INVESTMENT ADVISOR

10575 68<sup>th</sup> Avenue North  
Suite B-3  
Seminole, Florida 33772

Tel: 727.398.7900  
Fax: 727.398.2825

[www.CrossPlan.net](http://www.CrossPlan.net)

This Disclosure Brochure provides information about the qualifications and business practices of CrossPlan Money Management, which should be considered before becoming a client. You are welcome to contact us if you have any questions about the contents of this brochure - our contact information is listed to the right. Additional information about CrossPlan Money Management is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

The information contained in this Disclosure Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any State Securities Administrator. Furthermore, the term "registered investment advisor" is not intended to imply that CrossPlan Money Management has attained a certain level of skill or training.

BROCHURE  
DATED

**1**  
**JANUARY**  
**2024**

**MATERIAL CHANGES**

ITEM 2

There are no material changes to report. This Disclosure Brochure has been reviewed and is current as of the date indicated on the cover.

## TABLE OF CONTENTS

ITEM  
3

<b>ITEM 4</b>	<b>Advisory Business</b>	<b>4</b>
	Who We Are	4
	Our Mission	4
	What We Do	5
	How We Get to Know You	6
<b>ITEM 5</b>	<b>Fees &amp; Compensation</b>	<b>6</b>
	CrossPlan® Investment Programs	6
	Portfolio Monitoring	12
<b>ITEM 6</b>	<b>Performance-Based Fees &amp; Side-By-Side Management</b>	<b>14</b>
<b>ITEM 7</b>	<b>Types of Clients</b>	<b>14</b>
<b>ITEM 8</b>	<b>Methods of Analysis, Investment Strategies &amp; Risk of Loss</b>	<b>14</b>
	Portfolio Management - Methods of Analysis, Investment Strategies & Managing Risk	14
	Portfolio Monitoring - Methods of Analysis, Investment Strategies & Managing Risk	16
<b>ITEM 9</b>	<b>Disciplinary Information</b>	<b>17</b>
<b>ITEM 10</b>	<b>Other Financial Industry Activities &amp; Affiliations</b>	<b>17</b>
	Insurance Company Activities & Affiliations	17
<b>ITEM 11</b>	<b>Code of Ethics, Participation or Interest in Client Transactions &amp; Personal Trading</b>	<b>17</b>
	Code of Ethics	17
	Client Transactions	18
	Personal Trading	18
<b>ITEM 12</b>	<b>Brokerage Practices</b>	<b>19</b>
	Custodial Services	19
	Selection of Portfolio Managers	20
	Aggregating Trade Orders	20
<b>ITEM 13</b>	<b>Review of Accounts</b>	<b>20</b>
	Portfolio Management Reviews	20
	Portfolio Monitoring Reviews	21
<b>ITEM 14</b>	<b>Client Referrals &amp; Other Compensation</b>	<b>21</b>
	Referral Compensation	21
	Other Compensation (Indirect Benefit)	21
	Insurance Commissions	21
	Retirement Rollover Compensation	22
<b>ITEM 15</b>	<b>Custody</b>	<b>22</b>
	Management Fee Deduction	22
	Standing Letters of Authorization	23
<b>ITEM 16</b>	<b>Investment Discretion</b>	<b>24</b>
	Securities & Amount Bought or Sold	24
<b>ITEM 17</b>	<b>Voting Client Securities</b>	<b>24</b>
<b>ITEM 18</b>	<b>Financial Information</b>	<b>24</b>
<b>ITEM 19</b>	<b>Requirements for State-Registered Advisers</b>	<b>24</b>

## BROCHURE SUPPLEMENTS

**ADVISORY BUSINESS**

ITEM 4

**Who We Are**

CrossPlan® Money Management<sup>1</sup> (hereinafter referred to as “the Company”, “we”, “us” and “our”) was founded by Paul G. Palm in 1989 as a fee for service registered investment advisor<sup>2</sup> offering money management services<sup>3</sup> to assist you, our client<sup>4</sup>, achieve long-term growth and capital appreciation in your investment portfolio.

**Owners**

The following person controls the Company:

Name	Title	CRD#
John R. Palm	Managing Member & Chief Compliance Officer	1185127

**Assets Under Management**

We offer two (2) investment management services: Portfolio Management and Portfolio Monitoring. Portfolio Management accounts will be managed on a discretionary basis. All Portfolio Monitoring accounts are considered assets under advisement, managed by independent third-party money managers (“Portfolio Managers”)<sup>5</sup>. As of December 31, 2023, our assets totaled:

Discretionary Accounts.....	\$51,977,615
Assets Under Advisement.....	\$10,831,322

For more information on our Portfolio Management and Portfolio Monitoring services see “Investment Management” services below. You can also read more about our investment services under “Portfolio Management” and “Portfolio Monitoring” that includes the cost of our services in Item 5, “Fees & Compensation.”

**Our Mission**

Our mission is to simplify the vast complicated web of investment options that are increasingly being affected by today’s global financial market place. We maintain one overall objective - structure and implement investment strategies designed to maximize wealth, maintain investment expectation and minimize investment risk relative to your financial goals.

<sup>1</sup> CrossPlan® Money Management is the doing-business-as name for Palm Investment Strategies, LLC. CrossPlan® was originally incorporated in 1989 as Palm Investment Services, Inc. In February 2004, Palm Investment Strategies, LLC was organized and acquired all the assets of the existing advisory firm Palm Investment Services, Inc.  
<sup>2</sup> The term “registered investment advisor” is not intended to imply that CrossPlan® Money Management has attained a certain level of skill or training. It is used strictly to reference the fact that we are “registered” as a licensed “investment advisor” with the Florida Office of Financial Regulation - and with such other State Regulatory Agencies that may have limited regulatory jurisdiction over our business practices.  
<sup>3</sup> CrossPlan® Money Management is a fiduciary, as defined within the meaning of Title I of the Employer Retirement Income Security Act of 1974 (“ERISA”) and/or as defined under the Internal Revenue Code of 1986 (the “Code”) for any money management services provided to a client who is: (i) a plan participant or beneficiary of a retirement plan subject to ERISA or as described under the Code; or (ii) the beneficial owner of an Individual Retirement Account (“IRA”).  
<sup>4</sup> A client could be an individual and their family members, a family office, a foundation or endowment, a charitable organization, a corporation and/or small business, a trust, a guardianship, an estate, or any other type of entity to which we choose to give investment advice.  
<sup>5</sup> Portfolio assets managed by Portfolio Managers are not included in our “Regulatory Assets Under Management” calculation in our Form ADV Part 1A, Item 5.F unless we have discretionary authority to hire and fire Portfolio Managers and reallocate your assets without your prior consent. Therefore, the total assets under management disclosed in this Disclosure Brochure may not always match what is reported in our ADV Part 1A.

## What We Do

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**We manage wealth.** Our portfolio management services begin with stressing the importance of you making fiscally responsible decisions and disciplined economic choices in your personal life so we can effectively help you achieve your monetary goals for today's needs, tomorrow's dreams, and to leave a future legacy.

Focus of our portfolio management will be to identify your unique investment parameters that once defined, will allow us to provide clear perspective and insight into the investment alternatives to be most effective for your situation. These identifying parameters are a beginning point to successful portfolio management that includes:

- ❖ **Risk Assessment** - An attempt to identify your level of tolerable risk to an acceptable level of market volatility and expected investment return.
- ❖ **Investment Composition** - An investment strategy designed to achieve your unique financial expectations relative to your risk factors and predetermined benchmarks.
- ❖ **Tax Management** - Income producing investments, if at or nearing retirement or are risk averse, designed to protect assets and capitalize on investment returns that yield either a low tax base income or are tax exempt.

From these identifying factors, we make available two investment management options based on your financial needs. These services include: (1) Portfolio Management; and (2) Portfolio Selection and Monitoring.

### Portfolio Management

Our Portfolio management strategies focus on designing a portfolio allocation of using a mix of equity ("stock") positions, fixed income/debt ("bond") instruments, investment company ("mutual funds") products, and exchange traded funds ("ETFs") to achieve the best return on your investment capital.

You will find more information about our management services under "CrossPlan® Investment Programs" in Item 5, "Fees & Compensation" below and further description of our investment strategies under Item 8, "Methods of Analysis, Investment Strategies & Risk of Loss."

### Portfolio Monitoring

Portfolio monitoring consists of recommending third-party money managers ("Portfolio Manager") for you to select, whose investment disciplines most closely resemble your investment parameters. Portfolio monitoring includes:

- ❖ A written assessment guideline to balance investment return and risk, which emphasizes spreading risk among various asset classes and investment vehicles; and,
- ❖ Recommended Portfolio Managers to implement your asset allocation strategy.

Under these arrangements, we are **not involved in the day to day management of your portfolio assets**. Our responsibility will be to continuously evaluate the performance of your portfolio to ensure the Portfolio Manager adheres to your investment parameters and to make recommendations regarding the Portfolio Manager as market factors and your personal goals dictate.

More information about our “Portfolio Monitoring” services is available below under Item 5, “Fees & Compensation” below and how we evaluate Portfolio Managers is also discussed under Item 8, “Methods of Analysis, Investment Strategies & Risk of Loss.”

## How We Get to Know You

As a new client, we will have a pre-advisory consultation with you to discuss issues such as your current income and expenses, career, personal goals, investment return expectations and prior investment experience. In addition, we may have you complete a profile questionnaire<sup>6</sup> to gain greater insight into your financial needs.

With the complexity of today’s marketplace, it is critical for us to understand who you are and what you want to accomplish financially. We must have a clear picture of your unique financial composition and risk tolerance so that we can develop a successful portfolio management strategy and tailored asset allocation guideline. Our meetings with you to discuss your finances will help to eliminate much of the guesswork in achieving the security and independence you desire and simplify your financial alternatives. In return, we will have:

- ❖ Defined and narrowed objectives and investment options;
- ❖ Identified areas of greatest distress;
- ❖ Developed a strategy for addressing concerns about the future;
- ❖ Cultivated peace of mind; and,
- ❖ Created a unique picture of your overall economic personality.

Once your financial parameters have been identified, we will prepare a written assessment that outlines what asset mix is most suitable for your unique investment expectations and risk tolerance. This written assessment will guide us in the management of your account(s), and as a standard against which to measure future results and to make modifications where necessary.

## FEES & COMPENSATION

ITEM 5

### CrossPlan® Investment Programs

Our tailored investment strategies focus on matching your defined investment parameters with a portfolio style designed to meet your goals and objectives, risk tolerances and time frames. Such investment strategies may or may not include a combination of the following programs depending on your qualifications.

#### CrossPlan® Sector Momentum

**OBJECTIVE** - The investment strategy for the Sector Momentum program rotates between sectors based on technical and fundamental research. The program provides an active approach to managing a portion of your portfolio using sector ETF’s and/or sector specific mutual funds.

Industry and broader sector trends have become some of the most important factors to enhance relative performance of a portfolio. This program buys and then holds different

<sup>6</sup> The profile questionnaire we use is an important tool in gathering information about your investment methodology, risk tolerance, income/tax bracket, liquidity, time horizons, etc. If you elect not to answer the questionnaire or chooses to respond with limited input, it is possible that we could operate in a handicapped capacity contrary to your investment needs. Therefore, if you desire the most effective and accurate recommendations regarding your managed account(s), you should make every effort to provide us with your detailed personal needs and objectives, along with detailed financial and tax information.

sectors using a price momentum strategy and then strategically employing hedging techniques. The price momentum rationale is that the previous quarter's winners carry their momentum into the next quarter

**MANAGEMENT** - The Sector Momentum program seeks to provide you with long-term capital appreciation through an actively managed portfolio of sector ETF's or sector mutual funds.

<b>Investment Type:</b>	Separately Managed Account
<b>Style:</b>	Actively Managed - Strategic and Disciplined
<b>Account Minimum:</b>	\$25,000
<b>Annual Fee:</b>	2.00% <sup>†</sup>
<b>Key Benefits:</b>	Sector exposure with risk management

<sup>†</sup> We retain discretion to negotiate the management fee on a client-by-client basis depending on the size and complexity of the portfolio managed. For more information on how we will handle your account, see "CrossPlan® Investment Program Protocols" below.

**INVESTMENT PROCESS** - The price momentum model is purely mechanical, allowing no subjectivity in trading decisions. 70% of the portfolio is dedicated to this sector strategy. The remaining 30% may utilize specialized securities designed to magnify (and in some cases produce inverse of) the performance of various market indexes such as the Standard & Poor's 500 Index or the NASDAQ 100 Index. Additional description of this investment process:

1. Identify 5 top-ranked sectors with best relative price performance over a 3 month period.
2. Purchase sector ETF or sector mutual fund shares in an attempt to replicate performance of the top-ranked sectors.
3. Equally weigh the selected 5 sectors.
4. Review rankings every 90 day period and repeat the process.
5. Hedge the portfolio of sectors, if necessary, as described below.

**HEDGING** - Hedging is an important, if not vital, part of this portfolio. Hedging is a strategy that attempts to reduce risk of a portfolio by making investments that are expected to perform differently than each other. Hedging can take place when the long-term bullish percents reverse down from above 70% level. In the case of this portfolio, inverse correlation mutual fund shares can be used during these periods. While hedging is a strategy that attempts to reduce risk, it is important to understand that inverse correlation funds will experience loss when benchmark indexes rise.

### **CrossPlan® Relative Strength (RS) Allocation**

**OBJECTIVE** - RS Allocation is a tool that keeps us focused in the right area of the market at the right time. We think of the relative strength almost like a funnel of money flow. As the stock is outperforming a particular index, money is flowing more heavily toward that equity than that of the broader market. Likewise, if the stock is underperforming in comparison to an index, the equity has money flowing at a slower rate into the equity versus the general market.

A stock that displays improving relative strength versus the market or a corresponding sector index may be on the verge of an aggressive move to the upside. Conversely, a stock that begins to show weakness relative to the market or its peers may be poised for a breakdown.

**MANAGEMENT** - The RS Allocation program seeks to provide you with long-term capital appreciation through an actively managed portfolio of sector ETF's or mutual funds.

<b>Investment Type:</b>	Separately Managed Account
<b>Style:</b>	Actively Asset Allocation based on RS
<b>Account Minimum:</b>	\$100,000
<b>Annual Fee:</b>	2.00% <sup>†</sup>
<b>Key Benefits:</b>	Active management of asset classes

<sup>†</sup> We retain discretion to negotiate the management fee on a client-by-client basis depending on the size and complexity of the portfolio managed. For more information on how we will handle your account, see “CrossPlan® Investment Program Protocols” below.

**INVESTMENT PROCESS** - There are seven different levels to the investing program and each level addresses a different market category. For instance, level one is comparing the relative strength of the S&P 500 on a cap weighted basis to an equal weighted basis to determine the best place to be. Level two compares small, mid and large cap stocks. The system keeps working down to alternative investments, includes a cash component, which can reduce equity exposure when the indicators are negative.

1. Broad Market = Equal Weight - Cap-Weight
2. Capitalization = Large - Mid-Small
3. Style = Value - Blend - Growth
4. Sectors = 10 Broad Sectors
5. Global = Emerging - Europe - U.S. - Latin America - Far East
6. Fixed Income = Short - Medium - Long
7. Alternative Investments = S&P - Inverse S&P - Cash - Commodities

**MAINTENANCE** - If a change is made in the group that is favored, sell the current holding and replace it with the new favored area for each level.

**CrossPlan® Customized Fixed Income Accounts**

**OBJECTIVE** - A Customized Fixed Income Account focuses on investment grade corporate fixed income securities; however we do not have the flexibility to invest in other asset classes in order to add value. The average duration and/or laddering of investments are customizable and therefore the account has a high minimum investment.

The laddered portfolio provides higher current income, greater safety through diversification, built-in liquidity, dramatically improved predictability of future income, and the ability to automatically adapt to a changing interest rate environment, usually on the very best terms available. The laddered portfolio approach does all this, without requiring the investor to forecast future interest rates or to make complicated re-investment decisions.

**MANAGEMENT** - The Customized Fixed Income Account program seeks to build a portfolio of fixed income investments if you are a more conservative investor or you need income.

<b>Investment Type:</b>	Separately Managed Account
<b>Style:</b>	Fixed Income
<b>Account Minimum:</b>	\$500,000
<b>Annual Fee:</b>	1.50% <sup>†</sup>
<b>Key Benefits:</b>	Conservative

<sup>†</sup> We retain discretion to negotiate the management fee on a client-by-client basis depending on the size and complexity of the portfolio managed. For more information on how we will handle your account, see “CrossPlan® Investment Program Protocols” below.



**INVESTMENT PROCESS -**

1. **Choose an appropriate average term.** This should be the length of time over which the income from your portfolio needs to be highly predictable.
2. **Calculate the longest maturity to be used in the portfolio.** In a portfolio where each individual position will be approximately equal in size and spaced at even intervals, then the longest term instrument to be included would be roughly twice as long as the average term.
3. **Determine how many positions to use (i.e. how many steps on the ladder).** The more positions to be used, the shorter the intervals between each maturity date, and hence the smoother the transition from one interest rate environment to the next.
4. **Adhere to a re-investment rule.** In order to ensure that the laddered portfolio retains the same average term over time, each time an issue matures the proceeds should be re-invested out at the longest acceptable term as determined in Step 2 (i.e. at the top of the ladder).

**CrossPlan® Dividend & Growth**

**OBJECTIVE** - The Dividend & Growth program is a separately managed account of individual, dividend paying stocks. This portfolio is highly customizable and therefore has a high minimum investment.

To stay ahead of rising costs and taxes, you have to grow your assets over time. History has shown that one of the best ways to do this is by investing in stocks. Our Dividend & Growth program seeks to invest in stocks that provide income through dividends. Stocks that pay dividends can be less volatile than stocks that don't because investors in these securities are more inclined to hold onto income-paying stocks through down markets. In addition, you have the option of receiving dividends in a monthly income check from the account or reinvesting dividends. Reinvested dividends tend to boost total returns

**MANAGEMENT** - The Dividend & Growth program seeks to produce income with the potential for capital growth. Emphasis is placed on capital preservation as an investment objective.

<b>Investment Type:</b>	Separately Managed Account
<b>Style:</b>	Actively Managed - Individual Securities
<b>Account Minimum:</b>	\$500,000
<b>Annual Fee:</b>	2.50% <sup>†</sup>
<b>Key Benefits:</b>	Income plus potential for growth

<sup>†</sup> We retain discretion to negotiate the management fee on a client-by-client basis depending on the size and complexity of the portfolio managed. For more information on how we will handle your account, see "CrossPlan® Investment Program Protocols" below.

**INVESTMENT PROCESS** - 75% to 100% of the account will hold between 25 and 40 dividend paying securities. Securities are chosen based on fundamental research. Unless the fundamental picture changes, stocks will be held long-term. Additionally, risk management based on technical analysis may be used as a "sell discipline" when stock charts break major support levels or have major trend changes. Stocks may be worked into and NOT all bought immediately in order to attempt get positive risk versus reward entry points. Stocks will be monitored each week and/or upon news, fundamental data, or technical alert. Initial position in each stock will represent between 3% to 5% position of the total portfolio.

## CrossPlan® All-Cap Value - Concentrated

**OBJECTIVE** - The All-Cap Value program is developed using a concentrated, value strategy. The strategy is not a traditional or diversified value approach. Rather, the stock selection process is *top down with special focus on relative strength*.

**MANAGEMENT** - The All-Cap Value program seeks to uncover the greatest values within those areas of the market that are currently exhibiting relative strength. The number of equities is finally pared to 10 to 15.

<b>Investment Type:</b>	Separately Managed Account
<b>Style:</b>	Concentrated Position in Value Equities
<b>Account Minimum:</b>	\$100,000
<b>Annual Fee:</b>	2.50% <sup>†</sup>
<b>Key Benefits:</b>	Owning a portfolio of stocks that are “on-sale”

<sup>†</sup> We retain discretion to negotiate the management fee on a client-by-client basis depending on the size and complexity of the portfolio managed. For more information on how we will handle your account, see “CrossPlan® Investment Program Protocols” below.

**INVESTMENT PROCESS** - The investment process hinges on the discovery of “out of favor” stocks that preferably generate dividend yields. No more than a 7% initial position will be taken in each stock. A fully invested portfolio will hold approximately 10 to 15 names. From time to time specialized securities may be used which are designed to magnify (and in some cases produce inverse of) the performance of broad market indexes.

## CrossPlan® Customized Portfolios

**OBJECTIVE** - Customized Portfolios are constructed on an individual basis with varying levels of involvement and participation from you depending upon your interest.

**MANAGEMENT** - The Customized Portfolios program seeks to accumulate wealth and preserve capital using a top down research methodology.

<b>Investment Type:</b>	Separately Managed Account
<b>Style:</b>	Customized
<b>Account Minimum:</b>	\$100,000
<b>Annual Fee:</b>	2.20% <sup>†</sup>
<b>Key Benefits:</b>	Create a personalized portfolio

<sup>†</sup> We retain discretion to negotiate the management fee on a client-by-client basis depending on the size and complexity of the portfolio managed. For more information on how we will handle your account, see “CrossPlan® Investment Program Protocols” below.

**INVESTMENT PROCESS** - These accounts are individually managed and invested based on research derived from point & figure technical analysis. This is accomplished through a top down research methodology that begins with an evaluation of market risk as measured by the long-term bullish percent indicators. These indicators are based on the law of supply and demand and have been in existence for more than forty years. The first step in the investment process determines what amount of the account should be put to work in an invested position. After this step, sectors are screened and chosen using trend, momentum and relative strength indicators. Finally, equities, ETF’s or mutual funds are used to implement the desired and appropriate investment position.

## CrossPlan® Investment Program Protocols

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The following protocols establish how we handle our Investment Program portfolio management accounts and what you should expect when it comes to: (i) managing your account; (ii) your bill for investment services; (iii) deposits and withdrawals; and, (iv) other fees charged to your account(s).

### DISCRETION

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We will establish discretionary trading authority on all management accounts to execute securities transactions at anytime without your prior consent or advice.

At anytime however, you may impose restrictions, **in writing**, on our discretionary authority (i.e., limit the types/amounts of particular securities purchased for your account, exclude the ability to purchase securities with an inverse relationship to the market, limit our use of leverage, etc.)

### BILLING

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Portfolio management is provided on an asset-based fee arrangement that will be billed to your account quarterly **in advance**. The fees indicated under each of the above CrossPlan® Investment Programs are calculated based on the aggregate market value of your account on the last business day of the previous calendar quarter multiplied by the corresponding Investment Program's annual percentage rate (i.e.,  $2.50\% \div 4 = 0.625\%$ ).

For **new managed accounts** opened in mid-quarter, our fee will be based on a pro-rated calculation of your assets to be managed for remainder of the existing quarter. For existing portfolio management accounts, **pro-rated adjustments will be made for partial deposits and/or withdrawals** made between billing cycles (See "Deposits & Withdrawals" below for more information.).

We retain discretion to **negotiate the management fee** indicated under each of the Investment Program strategies on a client-by-client basis. Advisory fees will be deducted first from any money market funds or cash balances. If such assets are insufficient to satisfy payment of such fees, a portion of the account assets will be liquidated to cover the fees.

### DEPOSITS AND WITHDRAWALS

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Assets deposited by you into your portfolio management account between billing cycles will **not** result in additional management fees being billed to your account **unless such deposits exceed \$1,000**. We do not want to discourage you from investing additional capital but deposits of this amount or greater, in most cases, will require modifications and adjustments to your investment allocation. Therefore, we reserve the right to bill your account a pro-rated fee based upon the number of days remaining in the current quarterly period for deposits exceeding the above amount.

For assets you may withdraw during the quarter, we **do not make partial refunds** of our quarterly portfolio management fee. Just as with deposits, withdrawals from your account will require modifications and adjustments to be made to correct the allocation of assets in your portfolio.

### FEE EXCLUSIONS

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The above fees for all of our management services are exclusive of any charges imposed by the custodial firm including, but not limited to: (i) any Exchange/SEC fees; (ii) certain

transfer taxes; (iii) service or account charges, including, postage/handling fees, electronic fund and wire transfer fees, auction fees, debit balances, margin interest, certain odd-lot differentials and mutual fund short-term redemption fees; and (iv) brokerage and execution costs associated with securities held in your managed account. There can also be other fees charged to your account that are unaffiliated with our management services. Please see “Custodial Services” under Item 12, “**Brokerage Practices**” for more information on the custodial firms we will use for brokerage arrangements.

In addition, all fees paid to us for portfolio management services are separate from any fees and expenses charged on mutual fund shares by the investment company or by the investment advisor managing the mutual fund portfolios. These expenses generally include management fees and various fund expense, such as: redemption fees, account fees, and purchase fees may occur but are the exception within managed accounts at institutional custodians. A complete explanation of these expenses charged by the mutual funds is contained in each mutual fund’s prospectus. You are encouraged to carefully read the fund prospectus.

### **Termination Provisions for CrossPlan® Investment Program**

To terminate our investment advisory services, either party (you or us) by written notification to the other party, may terminate the Investment Advisory Agreement at any time, provided such written notification is received at **least 30 days prior** to the date of termination (i.e.; To terminate services on October 1<sup>st</sup>, a request for termination should be received in our office by September 1<sup>st</sup>.). Such notification **should include the date the termination will go into affect along with any final instructions on the account** (i.e., liquidate the account, finalize all transactions and/or cease all investment activity).

**We do not refund management fees.** To not lose any of your prepaid quarterly management fees, the termination of your account should fall on the first/last day of a calendar quarter. Once the termination of investment advisory services has been implemented, **neither party has any obligation to the other** - we no longer earn management fees or give investment advice and you become responsible for making your own investment decisions.

### **Portfolio Monitoring**

Under the arrangements with the Portfolio Managers, we are not involved in the day to day management of your portfolio assets. **Our responsibility to the Portfolio Manager(s)** will be to ensure you meet their minimum qualifications. Once your account has been established we will provide all administrative and clerical duties as may be required to service your account. The Portfolio Manager(s) may have little or no direct contact with you.

**Our responsibility to you** will be to continuously evaluate the performance of your portfolio to ensure the Portfolio Manager adheres to your asset allocation guidelines and will make recommendations to you regarding the Portfolio Manager as market factors and your personal goals dictate.

### **Portfolio Managers Fee Structure**

The Portfolio Managers who will be used to manage your account(s) will disclose their fees for management services in their Disclosure Brochures (the Portfolio Manager’s ADV Part 2A: Firm Brochure or Part 2A Appendix 1: Wrap Fee Program Brochure), **which we will provide you prior to, or at the same time as, opening an account.** The fees that will be charged to your account(s) will include:

1. The Portfolio Manager's management fee;
2. Our Portfolio Monitoring fee (not to exceed 2.20%) that the Portfolio Manager **will pay us from the total management fee they collect**; and,
3. Trading commissions and/or account charges, depending on if the Portfolio Manager is "wrapping" all the fees, which may be imposed by the custodian or broker/dealer used to custody your account(s).

The Portfolio Manager's Disclosure Brochure contains all pertinent disclosures relating to their management services, fee structure for such services, and their termination provisions - **you are encouraged to carefully review these disclosures.**

### **GILDER, GAGNON, HOWE & CO., LLC**

Gilder, Gagnon, Howe & Co., LLC<sup>7</sup>, ("GGH") is a Portfolio Manager who is a licensed broker/dealer (member NYSE/FINRA/SIPC) and an SEC registered investment advisor. Certain GGH's fees are commission generated from buy and sell transactions in a client's account. **We do not earn any part of the commissions charged by GGH.**

**Non-Qualified Accounts are Brokerage Accounts:** GGH charges high brokerage fees, averaging **2% or more for each trade executed**. Further, it is anticipated that turnover in your brokerage account, counting both buy and sell transactions, may range from **200% to 1000%** per year or higher. Thus, the annual brokerage fees could amount to **4% to 13% of the average brokerage account balance** per year or higher. Comparable services may be available for less cost elsewhere and with less overall risk to your managed account.

**Qualified Retirement Accounts are Advisory Accounts:** Retirement accounts will be charged a fee based on a percentage of assets under GGH management. The annual fee will be 3.00% on the first \$1,000,000 and 2.5% for every dollar of assets in excess of \$1,000,000. These fees will be calculated on a pro-rated monthly basis, based on the equity reported on the client's month end account statement, and will be charged to the account the following month. There are no commissions or transaction charges for trades in qualified accounts.

Using GGH for portfolio monitoring services, we are responsible for billing our management fee for portfolio monitoring services. Our fee, which is an addition to the fees charged by GGH, will not exceed **1.50%** annually (See "CrossPlan® Investment Program Protocols" above for how we will handle your account.).

### **Protocols for Portfolio Monitoring & Selection**

You will want to consult the Portfolio Manager's Disclosure Brochure for their policies on how they will handle your account; such as, billing, deposits and withdrawals, fee exclusions, termination, and any other unique advisory costs associated with their service since we **do not take discretion** over the management of your account and we **do not handle any of the billing (except for GGH accounts)**. We will discuss these arrangements with you when we go to open your account with a Portfolio Manager; however, you are encouraged to read their terms for management on your own.

<sup>7</sup> Gilder, Gagnon, Howe & Co. LLC is a licensed broker/dealer and SEC registered investment advisor. GGH representatives are stockbrokers, managing individual accounts on a discretionary basis. As such, GGH can earn their income by charging commissions on trades, not advisory fees, like the other listed Portfolio Managers who are only registered investment advisors

## PERFORMANCE-BASED FEES & SIDE-BY-SIDE MANAGEMENT

ITEM 6

We do not charge fees based on a share of capital gains or the capital appreciation of the assets held in your accounts.

## TYPES OF CLIENTS

ITEM 7

The types of clients we offer advisory services to are described above under “Who We Are” in the Item 4, the “Advisory Business” section. Our minimum account size for portfolio management is disclosed above under each of our “CrossPlan® Investment Programs” in Item 5 above in the, “Fees & Compensation” section of this Brochure.

## METHODS OF ANALYSIS, INVESTMENT STRATEGIES & RISK OF LOSS

ITEM 8

### Portfolio Management - Methods of Analysis, Investment Strategies & Managing Risk

With the ever-evolving dynamics of our U.S. financial markets, the economy, and the influence of global emerging markets, we feel that a more proactive approach to portfolio management is necessary to achieve the long-term returns you desire. In an ideal world we would want to “buy-and-hold” a stock forever, enjoying the long-term growth of the investment... in today’s economic environment this is an unrealistic expectation. Conventional “buy-and-hold” strategies are not designed to reduce your exposure in fluctuating or declining financial markets.

Our portfolio management services take into consideration these market characteristics and tailor portfolios using a mix of equity (“stock”) positions, fixed income/debt (“bond”) instruments, investment company (“mutual funds”) products, and exchange traded funds (“ETFs”).

In addition, depending on your risk tolerance, we may also recommend using the following investment vehicles to achieve your desired investment objective: leveraged index funds, closed-end funds, hedge funds, derivatives (i.e., options, commodities, etc.), and other publicly/privately traded securities. However, these investment vehicles bring on a different risk dynamic. If we recommend investment in one of these securities, we will discuss with you the limitations of such security and the potential risk factors to your portfolio.

#### Methods of Analysis

In analyzing securities to develop an efficient asset allocation portfolio, we will use a combination of analysis techniques to gathering information and to guide us in our management decisions.

#### FUNDAMENTAL ANALYSIS

Fundamental analysis considers: efficiency ratios, growth rates, enterprise value, economic conditions, earnings, cash flow, book value projections, industry outlook, politics (as it relates to investments), historical data, price-earnings ratios, dividends, general level of interest rates, company management, debt ratios and tax benefits.

**RISKS** - Fundamental analysis places greater value on the long-term financial structure and health of a company, which may have little to no bearing on what is actually happening in the market place. Investing in companies with sound financial data/strength and a history of health returns can be a good long-term investment to hold in your portfolio; however, such fundamental data does not always correlate to the trading value of the stock on the exchanges. In the short-term, the stock can decrease in value as investors trade in other market sectors.

### TECHNICAL ANALYSIS

Technical analysis utilizes current and historical pricing information to help us identify trends in the broader domestic and foreign equity and fixed income markets, and in the underlying assets themselves. This may involve the use of various technical indicators, such as moving averages and trend-lines, among others.

**RISKS** - Technical analysis is charting the historical market data of a stock, taking into consideration current market conditions, to forecast the direction of a future stock price rather than using fundamental tools for evaluating a company's financial strength. Technical analysis focuses on the price movement of a security trading in the market place. This is an ideal tool for short-term investing to identify ideal market entry/exit points. However, no market indicator is absolutely reliable and your investment portfolio can underperform in the short-term should the market indicators be incorrect.

Fundamental analysis provides us with a broad long-term view of a security that begins with determining a company's value and the strength of its financials while technical analysis is short-term focusing on the statistics generated by market activity.

### Investment Strategies

We are not bound to a specific investment strategy or ideology for the management of your investment portfolio. We understand markets and **money made** from increased stock values has greater risk (volatility) than **money earned** from dividends (secure and stable) in income-oriented securities. Our goal is to balance making and earning money by maintaining a disciplined management approach, regardless of the strategy, so as to not sacrifice long-term goals for short term gains.

Some of general research tools we utilize are as follows:

- ❖ **Offense or Defense** - CrossPlan® uses technical market indicators based on the irrefutable law of supply and demand to determine whether offense or defense is dictated. These indicators have been in existence for almost forty years.
- ❖ **Relative Strength** - In our analysis, relative strength plays a very important role. The relative strength charts will typically lead us to investments with a higher probability of outperforming the market.
- ❖ **Top-Down Approach** - We use our primary market indicators to get a measure of overall risk. We then analyze our broad industry sectors to determine which sector or sectors are in favor.
- ❖ **Momentum** - This is the theory that the previous period's winners carry their momentum for a period of time in the future. This research is used in selected CrossPlan® portfolios.

There is always a time to buy and a time to sell even the most attractive stocks; we do not feel compelled to be fully invested in stocks when an alternative investment (cash reserves and/or bonds) offers a more attractive opportunity. In fact, it is our belief that avoiding

severe losses is more important in determining overall market performance over the course of an entire market cycle.

### Managing Risk

The biggest risk to you is the risk that the value of your investment portfolio will decrease due to moves in the market. This risk is referred to as the **market risk** factor, also known as variability or volatility risk. Other important risk factors:

- ❖ **Interest Rate Risk** - Interest rate risk affects the value of bonds more than stocks. Essentially, when the interest rate on a bond begins to rise, the value (bond price) begins to drop; and vice versa, when interest rates on a bond fall, the bond value rises.
- ❖ **Equity Risk** - Equity risk is the risk that the value of your stocks will depreciate due to stock market dynamics causing one to lose money.
- ❖ **Currency Risk** - Currency risk is the risk that arises from the change in price of one currency against that of another. Investment values in internationally securities can be affected by changes in exchange rates.
- ❖ **Inflation Risk** - The reduction of purchasing power of investments over time.
- ❖ **Commodity Risk** - Commodity risk refers to the uncertainties of future market values and the size of future income caused by the fluctuation in the prices of commodities (i.e., grains, metals, food, electricity, etc...).

The risk factors we have cited here are not intended to be an exhaustive list, but are the most common risks your portfolio will encounter. Other risks that we haven't defined could be political, over-concentration, and liquidity to name a few. However notwithstanding these risk factors, the most important thing for you to understand is that regardless of how we analyze securities or the investment strategy and methodology we use to guide us in the management of your investment portfolio, **investing in a security involves a risk of loss that you should be willing and prepared to bear; and furthermore, past market performance is no guarantee that you will see equal or better future returns on your investment.**

### Portfolio Monitoring - Methods of Analysis, Investment Strategies & Managing Risk

With the use of Portfolio Managers, focus of our selection and monitoring is to **balance investment return and risk, with the emphasis on spreading risk among asset classes.** The specific methods of analysis, investment strategies, and risk management will be handled at the discretion of the Portfolio Manager.

We will perform a due-diligence review of our current and prospective Portfolio Managers to evaluate:

- ❖ **Regulatory Oversight:** Show proper licensure as: (a) a bank/trust company, (b) an insurance company, (c) a registered investment company, or (d) a registered investment advisor. In addition, a clear track record of compliance and understanding of their fiduciary duties.
- ❖ **Track Record:** The Portfolio Manager should have at least three years of history so that performance statistics can be properly calculated.
- ❖ **Stability:** The same management team should be in place for at least two years. This reflects team unity and balance.
- ❖ **Composition:** At least 80% of the Portfolio Manager's underlying securities investments should be consistent with the broad asset class.
- ❖ **Performance:** The Portfolio Manager's investment performance should show a competitive advantage relative to their peer group in both up and down markets.



This reflects an investment knowledge and understanding of the inner-workings of the securities markets.

In monitoring the investment performance of Portfolio Managers, we will utilize the above criteria to trigger when we should more closely scrutinize a particular Manager for possible replacement.

## DISCIPLINARY INFORMATION

ITEM 9

We have no legal or disciplinary events to report.

## OTHER FINANCIAL INDUSTRY ACTIVITIES & AFFILIATIONS

ITEM 10

### Insurance Company Activities & Affiliations

Certain of our supervised persons are licensed as resident life, health, and annuity insurance agents by the State of Florida and may be licensed as non-resident agents in other states. Each agent is licensed to sell insurance-related products and earn commissions from the sale of these products.

For further information on the potential conflicts and economic benefits from being a licensed insurance agent, see Item 14, “Client Referrals & Other Compensation” of this Brochure. In addition, more information about our supervised persons who offer investment advisory and insurance activities can be found in his individual “Brochure Supplements.”

## CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS & PERSONAL TRADING

ITEM 11

### Code of Ethics

As a fiduciary, the Company has an affirmative duty to render continuous, unbiased investment advice, and at all times act in your best interest. To maintain this ethical responsibility, we have adopted a Code of Ethics that establishes the fundamental principles of conduct and professionalism expected by all personnel in discharging their duties. This Code is a value-laden guide committing such persons to uphold the highest ethical standards, rooted in the most elementary maxim. Our Code of Ethics is designed to deter inappropriate behavior and heighten awareness as to what is right, fair, just and good by promoting:

- ❖ Honest and ethical conduct.
- ❖ Full, fair and accurate disclosure.
- ❖ Compliance with applicable rules and regulations.
- ❖ Reporting of any violation of the Code.
- ❖ Accountability.

To help you understand our ethical culture and standards, how we control sensitive information, and what steps have been taken to prevent personnel from abusing their inside position, a copy of our Code of Ethics is available for review upon request.

## Client Transactions

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We have a fiduciary duty to ensure that your welfare is not subordinated to any interests of ours or any of our personnel. The following disclosures are internal guidelines we have adopted to assist us in protecting all of our clientele.

### Participation or Interest

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It is against our policies for any owners, officers, directors and employees to invest with you or with a group of clients, or to advise you or a group of clients to invest in a private business interest or other non-marketable investment unless prior approval has been granted by our Chief Compliance Officer and such investment is not in violation of any SEC and/or State rules and regulations.

### Insider Trading Policy

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The Company is in compliance with the Insider Trading and Securities Fraud Enforcement Act of 1988. We do not share any non-public information with anyone who does not need to know and has set-up internal controls to guard your personal information.

### Class Action Policy

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The Company, as a general policy, does not elect to participate in class action lawsuits on your behalf. Rather, such decisions shall remain with you or with an entity you designate. We may assist you in determining whether you should pursue a particular class action lawsuit by assisting with the development of an applicable cost-benefit analysis, for example. However, the final determination of whether to participate, and the completion and tracking of any such related documentation, shall generally rest with you.

## Personal Trading

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Employees of ours are permitted to personally invest their own monies in securities, which may also be, from time to time, recommended to you. Most of the time, such investment purchases are independent of, and not connected in any way to, the investment decisions made on your behalf. However, there may be instances where investment purchases for you may also be made in an employee's account. In these situations we have implemented the following guidelines in order to ensure our fiduciary integrity:

1. No employee acting as an Investment Advisor Representative, or who has discretion over your account, shall buy or sell securities for their personal portfolio(s) where their decision is substantially derived, in whole or in part, by reason of his or her employment, unless the information is also available to the investing public on reasonable inquiry. No employee of ours shall prefer his or her own interest to that of yours or any other advisory client.
2. We maintain a list of all securities holdings for all our access employees. Our Chief Compliance Officer reviews these holdings on a regular basis.
3. We require that all employees act in accordance with all applicable Federal and State regulations governing registered investment advisory practices.
4. Bunched orders (See "Trading Allocation" above) may include employee accounts. In such cases, priority and advantage will be given to satisfy your order first regardless of the situation.
5. Any individual not in observance of the above may be subject to termination.

Personal trading activities are monitored by the Chief Compliance Officer to ensure that such activities do not impact upon your security or create conflicts of interest.

## BROKERAGE PRACTICES

ITEM 12

### Custodial Services

The Company maintains a custodial relationship with Charles Schwab & Company, Inc. (“Schwab”), a registered broker-dealer (member FINRA/SIPC), offering custodial services through their division Schwab Advisor Services to investment advisors. Schwab offers us services which include custody of securities, trade execution, clearance, and settlement of transactions.

Our recommendation for you to custody your assets with Schwab has no direct correlation to the services we receive from Schwab and the investment advice we offer you, although **we do receive economic benefits for which we do not have to pay** through our relationship with Schwab that are typically not available to Schwab retail clients. This creates an incentive for us to recommend Schwab based on the economic benefits we receive rather than on your interest in receiving most favorable execution. These economic benefits include the following products and services provided without cost or at a discount:

- ❖ Receipt of duplicate client statements and confirmations.
- ❖ Research related products and tools and consulting services.
- ❖ Access to a dedicated trading desk.
- ❖ Access to batch trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to accounts).
- ❖ The ability to have advisory fees deducted directly from accounts; and,
- ❖ Access to an electronic communications network for order entry and account information; and.

**We are not a subsidiary of, or an affiliated entity of, Schwab.** We have sole responsibility for investment advice rendered, and our advisory services are provided separately and independently from Schwab.

### Direction of Transactions and Commission Rates (Best Execution)

**We have a fiduciary duty to put your interests before our own.** The advisory support services we receive from Schwab creates an economic benefit to us and a potential conflict of interest to you; in that, our recommendation to custody your account(s) with Schwab may have been influenced by these arrangements/services. **This is not the case;** we have selected Schwab as our custodian of choice based on:

1. Their competitive transaction charges, trading platform, and on-line services for account administration and operational support.
2. Their general reputation, trading capabilities, investment inventory, their financial strength, and our personal experience in working with Schwab staff.

Since we do not recommend, suggest, or make available a selection of custodians other than Schwab, **best execution may not always be achieved.** Therefore, **you do not have to accept our recommendation to use Schwab as your custodian.** However, if you direct us to use another custodian, we may not be able to provide you complete institutional services and such service may cost you more in transaction fees.

## Selection of Portfolio Managers

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We will make available a select group of Portfolio Managers from which you may choose to manage your account(s). We will assist you in determining which will provide the most effective financial growth based upon your stated investment objectives and risk tolerance level as outlined in your IPS. **The brokerage practices of the Portfolio Manager will be disclosed in their ADV Part 2A: Firm Brochure or Part 2A Appendix 1: Wrap Fee Program Brochure, which we will provide you prior to, or at the same time as, opening an account.**

While we have exercised our best efforts evaluating the investment performance and cost of service offered by these Portfolio Managers, **we make no representation that the Portfolio Manager in which we refer you has the best investment performance or has the lowest portfolio management costs.** In addition, your selection of such Portfolio Managers will be limited to those with whom we have entered into service agreements. Therefore, it is possible that you might be able to contract for similar services elsewhere or separately, with equivalent or better performance at lower cost.

## Aggregating Trade Orders

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Our objective in order execution is to act fairly, impartially, and to take all reasonable steps to obtain the best possible results (known as “best execution”) for you, as well as with all our clients. Therefore if we are considering bunching orders, we will not bunch (aggregate) orders for a block trade unless: (i) the bunching of orders is done for the purpose of achieving best execution; and, (ii) no client is systematically advantaged or disadvantaged by bunching the orders.

In consideration of these objectives, we will take into account the unique execution factors of the buy/sell order before bunching accounts for a block trade. A few of those factors are:

- ❖ **Security Trading Volume** - Bunching orders in a block trade can secure price parity and continuity for our clients during heavy trading activity.
- ❖ **Number of Clients** - The fewer the number of client accounts involved in the bunched order may not yield better pricing or order execution; it may be more advantageous to perform an individual market order for each client. In addition preparing individual market orders, for the small number accounts involved, may be quicker to complete than preparing a bunch order.
- ❖ **Financial Instruments** - The type of security involved as well as the complexity of order can affect our ability to achieve best execution.

If you would like more detailed information on our trading allocation policies, a copy is available for review upon request.

## REVIEW OF ACCOUNTS

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ITEM 13

### Portfolio Management Reviews

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Our basic service is active portfolio management and each account is reviewed daily in the normal course of market observation. All accounts are reviewed in the context of investment objective of our CrossPlan® Investment Programs. Generally individual reallocations are not made except in the case of your cash needs.

You will receive monthly statements from Charles Schwab & Company, Inc. where your account(s) are custodied. Each statement will summarize the specific investments currently held, the value of your portfolio and account transactions. **You are encourage to review these statements for accuracy.**

You are also encouraged to review with us your investment strategies and account performance on an annual basis. Material changes in your personal circumstances, the general economy, and/or tax law changes can trigger more frequent reviews. However, **it is your responsibility to communicate these changes to us so that the appropriate adjustments can be made.**

### Portfolio Monitoring Reviews

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The supervised person over your account will monitor and evaluate the Portfolio Manager's performance on a regular basis. We understand your goals and tolerance for risk may change over time; therefore, **even though we are not involved in any way with the day-to-day management** of your assets maintained with a Portfolio Manager(s), we will supervise your portfolio and will make recommendations to you regarding the Portfolio Manager(s) as market factors and your personal goals dictate.

## CLIENT REFERRALS & OTHER COMPENSATION

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ITEM 14

### Referral Compensation

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We may directly compensate persons/firms for client referrals, provided that those persons are qualified and have entered a solicitation agreement with us. Under such arrangements, if you were referred to us by a solicitor, the solicitor will provide complete information on our relationship and the compensation that solicitor will receive should you choose to open an account. In no case will the fee that you pay be higher than it would be if you had dealt directly with us. In addition, we will adhere to each State's rules and regulations where the Solicitor resides prior to entering into any solicitation agreement with that person/firm.

### Other Compensation (Indirect Benefit)

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The Company receives an indirect economic benefit from Charles Schwab & Company, Inc. (See "Custodial Services" above under Item 12, "Brokerage Practices" for more detailed information on the products and services we receive.).

### Insurance Commissions

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In addition, as mentioned above in Item 10, "Other Financial Industry Activities & Affiliations", certain of our supervised persons are licensed independent insurance agents. As insurance agents, there are potential conflicts of interest when a supervised person suggests the need for you to purchase an insurance product in which they will earn a commission. This can create a situation of divided loyalty and the objectivity of the advice we render could be subjective and create a disadvantage to you. Therefore to ensure you understand your options when a supervised person approaches you on insurance products, we are providing you the following disclosures:

- ❖ You are under no obligation to accept the recommendations from our supervised persons to purchase insurance related products. **You are free to reject the recommendation; or if you want the insurance, to choose the insurance company**

and agent from whom to purchase the insurance. However, keep in mind that if you elect to purchase the insurance, regardless of where and from whom you purchase it, **such person will be entitled to earn a commission.**

- ❖ If you decide to purchase insurance from one of our supervised persons, they will only recommend insurance products from those insurance companies in which they have been appointed, and **therefore the pool of insurance companies to select from limited.** It is possible that you might be able to get a quote from an insurance company independently that has equivalent or better insurance coverage sold at a lower cost. **It is recommended that you investigate your options before making a final decision.**
- ❖ We do not share in any commission earned by our supervised persons or receive any economic benefit from the independent insurance companies.

Notwithstanding such potential conflicts of interest, we strive to serve your best interest and ensure such disclosure is being properly made to you in compliance with the Investment Adviser Act of 1940, Rule 275.206.

## Retirement Rollover Compensation

Earning a management fee from recommending the rollover of retirement plan assets to an IRA we manage is considered “self-dealing” and prohibited unless we comply with the Prohibited Transaction Exemption (“PTE”) 2020-02, “Improving Investment Advice for Workers & Retirees” exemption issued by the Department of Labor. The DOL considers earning a management fee “self-dealing” because it increases our compensation and profits while potentially disregarding the underlying costs paid by, and the services provided under, the retirement plan that might be more beneficial to you should your retirement assets remain with the plan. Therefore, when it comes to your retirement assets, there are typically four options you should consider when leaving an employer:

- ❖ Leave the account assets in the former employer’s plan, if permitted.
- ❖ Rollover the assets to the new employer’s plan if one is available and rollovers are permitted.
- ❖ Rollover the account assets to an Individual Retirement Account (an “IRA”); or,
- ❖ Cash out the retirement account assets (There may be tax consequences and/or IRS penalties depending on your age.).

Should you approach us to advise you on which option would be the best for your situation, we have an economic incentive to recommend you rollover your retirement account to a managed IRA account with us where we would earn a management fee on the assets. This can create a conflict of interest and the objectivity of the advice we render subjective and a disadvantage to you. Therefore, if we recommend you rollover your retirement account to an individually managed IRA account, you are under no obligation to engage us to manage your assets. You are free to take your account anywhere.

## CUSTODY

ITEM 15

### Management Fee Deduction

We do not take possession of or maintain custody of your funds or securities, but will simply monitor the holdings within your portfolio and trade your account based on your stated investment objectives and guidelines. Physical possession and custody of your funds and/or

securities shall be maintained with Charles Schwab & Company, Inc. as indicated above in Item 12, “**Brokerage Practices.**”

We are however defined as having custody since you have authorized us to deduct our advisory fees directly from your account. To protect you as well as to protect our advisory practice, we have implemented the following regulatory safeguards:

- ❖ We report to the regulatory authority (the Florida Office of Financial Regulation) having jurisdiction over our advisory practice that we have custody.
- ❖ Your funds and securities will be maintained with a qualified custodian (Schwab) in a separate account in your name.
- ❖ Authorization to withdrawal our management fees directly from your account will be approved by you prior to engaging in any portfolio management services.
- ❖ At the time we notify Schwab to withdrawal our quarterly fee from your account, we will send you a quarterly notice itemizing our fee. Itemization includes the formula used to calculate our fee, the amount of assets under management the fee is based on, and the time period covered by the fee.

Schwab is required by law to send you, at least quarterly, brokerage statements summarizing the specific investments currently held in your account, the value of your portfolio, and account transactions. **You are encouraged to compare the financial data contained in our report and/or itemized fee notice with the financial information disclosed in your account statement from Schwab to verify the accuracy and correctness of our reporting.**

### Standing Letters of Authorization

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We will allow you to maintain a Standing Letter of Authorization (“SLOA”) with our firm. However, SLOAs with asset transfer **instructions to a third-party** (e.g., any person/entity/joint account other than just you alone) define us as having custody under the Custody Rule (1940 Act Rule 206(4)-2). Therefore, to comply with the No-Action Letter issued by the SEC, relating to SLOAs and the Custody Rule, we have implemented the following regulatory safeguards and will only accept SLOAs under these conditions:

- ❖ The person and place of delivery must always be identified in the SLOA instructions. We will not approve any SLOAs where we are authorized to modify the instructions relating to the person and/or place of delivery.
- ❖ We will not accept SLOA instructions for delivery to a person affiliated with our firm and/or located at our place of business.
- ❖ The timing and amount of assets to transfer can be open-ended per the instructions of the SLOA.
- ❖ All SLOA instructions must be in writing and confirmed with your signature. We will not accept verbal changes to any SLOAs.

The SEC SLOA No-Action Letter identifies seven (7) steps to follow as part of the safekeeping requirements. The first two bullet-points above are our responsibility under the No-action Letter, the remaining five (5) are the responsibility of the qualified custodian (CS&Co). If you would like a complete list of the safekeeping instructions, let us know and we will be glad to provide you a copy.

## INVESTMENT DISCRETION

ITEM 16

### Securities & Amount Bought or Sold

We have you complete our Investment Advisory Agreement which sets forth our authority to buy and sell securities in whatever amounts are determined to be appropriate for your account and whether such transactions are with, or without, your prior approval.

You may, at any time, impose restrictions, **in writing**, on our discretionary authority (i.e., limit the types/amounts of particular securities purchased for your account, exclude the ability to purchase securities with an inverse relationship to the market, limit our use of leverage, etc.).

## VOTING CLIENT SECURITIES

ITEM 17

**We do not vote client proxies.** You understand and agree that you retain the right to vote all proxies, which are solicited for securities held in your managed accounts. Any proxy solicitations inadvertently received by us will be immediately forwarded to you for your evaluation and decision.

However, if you have specific questions regarding an action being solicited by the proxy that you do not understand, or you want clarification, you may contact us, and we will explain the particulars. Keep in mind we will not advise you in a direction to vote, that ultimate decision will be left to you.

## FINANCIAL INFORMATION

ITEM 18

We are not required to include financial information in our Disclosure Brochure since we will not take physical custody of client funds or securities or bill client accounts six (6) months or more in advance for more than \$500.

We are not aware of any current financial conditions that are likely to impair our ability to meet our contractual commitments to you.

## REQUIREMENTS FOR STATE-REGISTERED ADVISERS

ITEM 19

Information on each of our principal executive officers and management persons can be found in the attached "Brochure Supplements".

**END OF DISCLOSURE BROCHURE**



## FORM ADV: PART 2B

### BROCHURE SUPPLEMENT



## CrossPlan® Money Management

10575 68<sup>th</sup> Avenue North, Suite B-3  
Seminole, Florida 33772

Tel: 727.398.7900  
Fax: 727.398.2825

### SUPERVISION

#### John R. Palm

Chief Compliance Officer

e-Mail: john.palm@crossplan.net

Mr. Palm is responsible for the regulatory oversight of our advisory practice - ensuring our business activities are compliant with all federal and state regulations and that we are operating in compliance with our written policies and procedures.

In addition, the CrossPlan® Investment Programs are actively managed. Mr. Palm's duties include, but are not limited to: managing the investment activities of the Investment Programs, discussing investment options with clients, and meeting with clients to evaluate financial alternatives.

BROCHURE SUPPLEMENT  
DATED

1

JANUARY  
2024

This Brochure Supplement provides information about John R. Palm that is an accompaniment to the Disclosure Brochure for our firm, CrossPlan Money Management. You should have received both of these together as a complete disclosure packet. If you did not receive our Disclosure Brochure or if you should have questions about this Brochure Supplement for Mr. Palm, you are welcome to contact us - our contact information is listed to the left.

Additional information about CrossPlan Money Management and John R. Palm are also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## John R. Palm

CRD#: 1185127

Year of Birth: 1965

### EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

#### Education

1988 - Liberty University: Bachelor of Science in Political Science  
1992 - Liberty University: Masters in Religious Education

#### Licenses

FINRA Exams: Series 65 - Uniform Investment Advisor Law Examination  
Insurance: 2-15 License - Florida Life, Health & Variable Annuity Insurance

#### Business Background

02/2004 - Present .....Palm Investment Strategies, LLC - d/b/a CrossPlan® Money Management  
Position: Managing Member & Chief Compliance Officer  
12/1993 - 02/2004 .....Palm Investment Services, Inc.  
Position: Associate  
05/1992 - 12/1993 .....United World Missions  
Position: Cross-Cultural Training and Development

### DISCIPLINARY INFORMATION

Mr. Palm has no legal or disciplinary events to report.

### OTHER BUSINESS ACTIVITIES

#### Licensed Insurance Agent

Mr. Palm is a licensed independent insurance agent. He will receive the normal commissions associated with insurance sales. This creates an incentive for him to recommend, should you inquire, those products in which he will receive a commission. Consequently, the objectivity of the advice rendered could be subjective and create a disadvantage.

You are under no obligation to accept Mr. Palm's recommendation to purchase any insurance products. You are free to choose any independent insurance agent and insurance company to purchase your insurance. Regardless of the insurance agent from whom you select to purchase your insurance, he/she will earn the normal commission from the sale.

For more information about the potential conflicts of interest, see our Disclosure Brochure in Item 14, "Client Referrals & Other Compensation". Notwithstanding such potential conflicts of interest, we strive to act in your best interest and ensure disclosure is properly made to you in compliance with the Investment Advisor Act of 1940, Rule 275.206.

### ADDITIONAL COMPENSATION

Mr. Palm does not receive any economic benefit, sales awards, prizes or bonuses that are based on the number or amount of sales, client referrals, or from opening new accounts.

### REQUIREMENTS FOR STATE-REGISTERED ADVISERS

Mr. Palm has not been the subject of any arbitration claim, civil litigation, self-regulatory organization/administrative proceeding, or bankruptcy petition at any time during the past ten years.

CROSSPLAN  
MONEY MANAGEMENT

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## FORM ADV: PART 2B

### BROCHURE SUPPLEMENT



## CrossPlan® Money Management

10575 68<sup>th</sup> Avenue North, Suite B-3  
Seminole, Florida 33772

Tel: 727.398.7900  
Fax: 727.398.2825

### SUPERVISION

**John R. Palm**  
Chief Compliance Officer

e-Mail: john.palm@crossplan.net

Mr. Palm is responsible for the regulatory oversight of our advisory practice - ensuring our business activities are compliant with all federal and state regulations and that we are operating in compliance with our written policies and procedures.

In addition, the CrossPlan® Investment Programs are actively managed. Mr. Palm's duties include, but are not limited to: managing the investment activities of the Investment Programs, discussing investment options with clients, and meeting with clients to evaluate financial alternatives.

BROCHURE SUPPLEMENT  
DATED

1

**JANUARY  
2024**

This Brochure Supplement provides information about Allan J. Sansotta that is an accompaniment to the Disclosure Brochure for our firm, CrossPlan Money Management. You should have received both of these together as a complete disclosure packet. If you did not receive our Disclosure Brochure or if you should have questions about this Brochure Supplement for Mr. Sansotta, you are welcome to contact us - our contact information is listed to the left.

Additional information about CrossPlan Money Management and Allan J. Sansotta are also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Allan J. Sansotta

CRD#: 410631

Year of Birth: 1939

### EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

#### Education

1966 - Ohio State University: Business Administration with a Major in Finance

#### Licenses

FINRA Exams: Series 1 - Registered Representative Examination (Retired)  
Series 2 - Non-Member General Securities Examination (Retired)  
Series 4 - Registered Options Principal Examination (Retired)  
Series 5 - Interest Rate Options Examination (Retired)  
Series 40 - Registered Principal Examination (Retired)  
Series 63 - Uniform Securities Agent State Law Examination (Retired)  
Series 65 - Uniform Investment Advisor Law Examination (Active)

#### Business Background

06/2018 - Present .....Palm Investment Strategies, LLC - d/b/a CrossPlan® Money Management  
Position: Investment Advisor Representative  
07/1992 - 05/2018 .....Beacon Advisors, Inc.  
Position: President & Investment Advisor Representative

### DISCIPLINARY INFORMATION

Mr. Sansotta has no legal or disciplinary events to report.

### OTHER BUSINESS ACTIVITIES

Mr. Sansotta is not involved in any other business activities. Full focus of his attention is directed to meeting your financial and investment needs.

### ADDITIONAL COMPENSATION

Mr. Sansotta does not receive any economic benefit, sales awards, prizes or bonuses that are based on the number or amount of sales, client referrals, or from opening new accounts.

### REQUIREMENTS FOR STATE-REGISTERED ADVISERS

Mr. Sansotta has not been the subject of any arbitration claim, civil litigation, self-regulatory organization/administrative proceeding, or bankruptcy petition at any time during the past ten years.

**CROSSPLAN**  
MONEY MANAGEMENT

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