



**FIRM BROCHURE – ADV PART 2A**

**Item 1 – Cover Page**

**Sequent Planning, LLC  
D/B/A Futurity First Wealth Management**

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**Date of Disclosure Brochure: March 2026**

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This disclosure brochure provides information about the qualifications and business practices of Sequent Planning LLC (also referred to as we, us and Sequent Planning throughout this disclosure brochure). If you have any questions about the contents of this disclosure brochure, please contact Andrea Butler at 402-819-0251 or [andrea@sequentplanning.com](mailto:andrea@sequentplanning.com). The information in this disclosure brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Sequent Planning is also available on the Internet at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can view our firm's information on this website by searching for Sequent Planning, LLC or our firm's CRD number 160381.

\*Registration as an investment adviser does not imply a certain level of skill or training.

## Item 2 – Material Changes

The material changes in this brochure from the last annual updating amendment of Sequent Planning, LLC in March 2025, are described below. This list summarizes changes to policies, practices or conflicts of interests only and are disclosed throughout the year as they occur.

- Item 1, 4 and 10 - Chelsea Kiehler served as the interim Chief Compliance Officer of Sequent Planning LLC from June 4 to June 16, 2025.
- Item 1 and 4 – Andrea Butler is the Chief Compliance Officer of Sequent Planning, LLC as of June 16, 2025.
- Item 4 – Turnkey Asset Management Platform (TAMP) was added to the Advisory Services Offered
- Item 4 – BridgeFT was removed from Administrative Services provided.

In addition to the above, non-material changes have been made throughout the full Firm Brochure to align with the plain English requirements, including clarity, succinctness and readability.

We will ensure that you receive a summary of any material changes to this Firm Brochure within 120 days after our firm's fiscal year ends. Our firm's fiscal year ends on December 31, so you will receive the summary of material changes no later than April 30 each year. At that time, we will also offer or provide a copy of the most current Firm Brochure. We may also provide other ongoing disclosure information about material changes as necessary.

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## Item 4 – Advisory Business

### **Description of our Firm**

Sequent Planning, LLC (“Sequent Planning”) is an investment adviser registered with the United States Securities and Exchange Commission (“SEC”). Sequent Planning is a limited liability company (LLC) formed under the laws of the State of Nebraska since February 2012.

- Senior Market Sales, Inc. (“SMS”) is the parent company owning Sequent Planning. SMS, under its new owner, Alliant Insurance Services, Inc., has full voting rights of the ownership units of Sequent Planning.
- Sequent Planning has been registered as an investment adviser since February 2012.
- Andrea Butler is the Chief Compliance Officer of Sequent Planning, LLC.
- Sequent Planning is also doing business as Futurity First Wealth Management (FFWM). Throughout this document we utilize the name Sequent Planning, LLC, which does include the business practices of the DBA name.

The investment advisory services of Sequent Planning are provided to you through an appropriately licensed and qualified individual who is an investment adviser representative (“IAR”) of Sequent Planning (referred to as your IAR throughout this brochure).

Your IAR typically is not an employee of Sequent Planning; rather, your IAR typically is an independent contractor of Sequent Planning.

Your IAR is limited to providing advisory services and charging Advisory Fees (fees charged for services provided, usually based on Assets Under Management) in accordance with the descriptions detailed in this brochure. However, the exact services you receive and the fees you will be charged will be specified in your asset management agreement.

### **Description of Advisory Services**

The following are descriptions of the primary advisory services of Sequent Planning. Please understand that a written asset management agreement, which details the exact terms of the advisory service, must be signed by you and Sequent Planning before we can provide you with the services described below.

#### ***Asset Management Services***

Sequent Planning offers asset management services, which involves Sequent Planning providing you with continuous and ongoing supervision over your specified investment accounts. Sequent may create a unique investment portfolio for you, or we may decide together to utilize a third-party money manager (see TAMP section below).

Through our asset management services, Sequent Planning offers various asset allocation Models which may be developed by Sequent Planning, third parties or affiliates, and are designed to allocate assets among various asset classes. Our asset management program currently offers various strategic Models designed by Sequent Planning which invest in unaffiliated investment vehicles. Sequent Planning reserves the right to change, in its sole discretion from time to time and without prior notice to Clients:

- i. the number of Models available through the Program that it deems appropriate to address the investment objectives, investment time horizons, and risk tolerances of its clients;
- ii. the underlying investments that comprise each of the Models; and
- iii. the relative weightings of the underlying investment within each of the Models.

Sequent Planning is designated as your investment adviser of record on accounts as specified in your asset management agreement. Accounts consist only of separate account(s) held by qualified custodian(s) under your name. The qualified custodians maintain custody of all funds and securities of your accounts, and you retain all rights of ownership (e.g., right to withdraw securities or cash, exercise or delegate proxy voting and receive transaction confirmations) of the accounts.

Your accounts are managed by us based on your financial situation, investment objectives and risk tolerance. We actively monitor your accounts and provide advice regarding buying, selling, reinvesting or holding securities, cash or other investments.

We will need to obtain certain information from you to determine your financial situation and investment objectives. You will be responsible for notifying us of any updates regarding your financial situation, risk tolerance or investment objective. You have the ability to impose reasonable restrictions on the management of your accounts, including the ability to instruct us not to purchase or sell certain securities. We will contact you at least annually to discuss any changes or updates regarding your financial situation, risk tolerance or investment objectives. We are always reasonably available to consult with you regarding the status of your accounts.

It is important that you understand that we manage investments for other clients and may give them advice or take actions for them or for our personal accounts that is different from the advice we provide to you, or actions taken for you. We are not obligated to buy, sell or recommend to you any security or other investment that we may buy, sell or recommend for any other clients or for our own accounts.

**Financial Planning Services**

Sequent Planning offers financial planning services, which involve preparing a written financial plan covering specific or multiple topics. We provide written financial plans, which typically address the following topics: investment planning, retirement planning, insurance planning, tax planning, social security benefits, risk tolerance, balance sheet review and cash flow forecasting. When providing financial planning services, the main role of your IAR is to present your overall financial situation in an understandable format to help you understand where you are. We will help you set financial objectives, and create a financial plan for you. Written financial plans prepared by us usually do not include specific recommendations of individual securities.

These services are based on fixed fees or hourly fees determined by the firm based on factors such as complexity, time allocated, and planning services requested as outlined in the chart below, among other factors. The final fee structure is outlined in the Financial Planning Agreement.

<b>Basic</b>	<b>Comprehensive</b>	<b>Executive</b>
<ul style="list-style-type: none"> <li>• Traditional Income</li> <li>• Account Titling &amp; Beneficiary</li> <li>• Basic Balance Sheet &amp; Net Worth</li> <li>• Education Planning</li> <li>• Social Security Timing</li> <li>• Retirement Income Planning</li> </ul>	<ul style="list-style-type: none"> <li>• Basic +</li> <li>• Comprehensive Balance Sheet: Business Assets, Multiple Properties</li> <li>• Roth Conversion, HSA, LIRP, other basic tax planning strategies</li> <li>• Multi-generational planning</li> </ul>	<ul style="list-style-type: none"> <li>• Comprehensive +</li> <li>• Concentrated stocks, RSU, deferred compensation</li> <li>• Charitable Strategies</li> <li>• Legacy Strategies</li> <li>• Advance Estate Planning Coordinate with Attorneys</li> <li>• Succession Planning</li> </ul>

Unless you also engage Sequent in Asset Management Services as described above, our financial planning services do not involve implementing any transaction on your behalf or the active and ongoing monitoring or management of your investments or accounts. You have the sole responsibility of determining whether to implement our financial planning recommendations. To the extent that you would

like to implement any of our investment recommendations through Sequent Planning or retain Sequent Planning to actively monitor and manage your investments, you must execute a separate written asset management agreement with Sequent Planning.

### **Turn-Key Asset Management Platform (TAMP)**

Sequent Planning utilizes Turnkey Asset Management Platforms (“TAMPs”) to provide clients with access to third-party asset managers and model portfolios. These third-party managers maintain discretionary authority over the selection of underlying investments and the timing of trade execution within their respective strategies. Advisors at Sequent Planning do not direct or influence individual security selection or trade timing within these models; rather, their role is to conduct due diligence and select from a pre-approved list of managers and strategies that align with client objectives, risk tolerance, and financial planning considerations. Ongoing monitoring is performed to evaluate the continued appropriateness of selected managers and platforms.

The terms and conditions under which you engage with a third-party asset manager will be set forth in separate written agreements between:

- i. the client and Sequent Planning and
- ii. the client and the designated independent manager(s).

We will continue to render advisory services to you related to the ongoing monitoring and review of account performance, for which Sequent Planning will receive an annual advisory fee. In addition to this disclosure brochure from us, you will also receive the written disclosure brochure of any third-party money manager(s).

We have engaged the following third-party manager(s) for their TAMP offering:

- AdvisorEngine Portfolio Solutions, Inc. (AEPS) – This engagement allows us to select from AEPS program offerings to be used to manage some or all of your investment assets, based upon your individual circumstances and investment needs. Any offerings selected for your account with AEPS will be managed on a discretionary basis by AEPS and their sub-advisor, SMARtX Advisory Solutions, LLC (“SMARtX”) or a third-party manager according to the mandate of the selected strategy. SMARtX, under the terms of a sub-advisory agreement with AEPS, will maintain responsibility to monitor and periodically send alerts to us to rebalance your account as necessary to keep your account within the mandate of your selected strategy. For more information about SMARtX’s advisory services, please refer to its Form ADV.

Clients are advised that there may be other third-party managed programs not recommended by our firm, which are suitable for the client and that may be more or less costly than arrangements recommended by our firm. No guarantees can be made that a client’s financial goals or objectives will be achieved by a third-party investment adviser recommended by our firm. Further, no guarantees of performance can ever be offered by our firm (*Please refer to Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss for more details.*)

### **Retirement Plan Services**

Sequent Planning offers retirement plan services to retirement plan sponsors and to individual participants in retirement plans including the Fiduciary Consulting Services, Fiduciary Management Services and Non-Fiduciary Services.

The types and levels of risks of any type of investment are typically discussed with companies in defining the investment policies and objectives that will guide investment decisions for their retirement plan accounts. As part of our retirement plan services, we can discuss those investments and investment

strategies that we believe may tend to reduce these risks for a particular company's circumstances and plan participants.

Companies and their Plan participants should understand that in order to obtain higher rates of return on investments, higher levels of risk must be accepted. Based upon discussions with the company, we will attempt to identify the balance of risks and rewards that is appropriate and suitable for retirement plan sponsors and individual participants. It is both the company's and individual participants' responsibility to ask questions if either does not fully understand the risks associated with any investment prior to investing.

Sequent Planning cannot ensure investments will be profitable or ensure that no losses will occur in the company or Plan participant accounts. Past performance is an important consideration with respect to any investment or investment advisor, but it is not necessarily an accurate predictor of future performance.

Sequent Planning will disclose to the company, to the extent required by ERISA Regulation Section 2550.408b-2(c), changes to the information that we are required to disclose under ERISA Regulation Section 2550.408b-2(c)(1)(iv) as soon as practicable, but no later than sixty (60) days from the date on which we are informed of the change (unless such disclosure is precluded due to extraordinary circumstances beyond our control, in which case the information will be disclosed as soon as practicable).

In accordance with ERISA Regulation Section 2550.408b-2(c)(vi)(A), we will disclose within thirty (30) days following receipt of a written request from the responsible plan fiduciary or Plan Administrator (unless such disclosure is precluded due to extraordinary circumstances beyond our control, in which case the information will be disclosed as soon as practicable) all information related to the Qualified Retirement Plan Agreement and any compensation or fees received in connection with the Agreement that is required for the Plan to comply with the reporting and disclosure requirements of Title 1 of ERISA and the regulations, forms and schedules issued thereunder.

If we make an unintentional error or omission in disclosing the information required under ERISA Regulation Section 2550.408b-2(c)(1)(iv) or (vi), we will disclose to the company the correct information as soon as practicable, but no later than thirty (30) days from the date on which we learn of such error or omission.

#### Fiduciary Consulting Services

We offer to provide the following Fiduciary Consulting Services to retirement plans:

- Investment Policy Statement Preparation – Sequent Planning will help you develop an investment policy statement which establishes the investment policies and objectives for the Plan. You will have the ultimate responsibility and authority to adopt and amend the investment policy statement.
- Non-Discretionary Investment Advice – Sequent Planning will provide you with general, non-discretionary investment advice regarding assets classes and investment options, consistent with your Plan's investment policy statement.
- Investment Selection Services – Sequent Planning will provide you with recommendations of investment options consistent with ERISA section 404(c).
- Investment Due Diligence Review – Sequent Planning will provide you with periodic due diligence reviews of the Plan's reports, investment options and recommendations.
- Investment Monitoring – Sequent Planning will assist in monitoring investment options by preparing periodic investment reports which document investment performance, consistency of fund management, and conformation to the guidelines set forth in the investment policy

statement. Sequent Planning will make recommendations to maintain, or remove and replace, investment options.

- Default Investment Alternative Advice – Sequent Planning will provide you with non-discretionary investment advice to assist you with the development of qualified default investment alternative(s) (“QDIA”), as defined in DOL Reg. Section 2550.404c-5(e)(4)(i), for participants who are automatically enrolled in the Plan or who otherwise fail to make an investment election. You will retain the sole responsibility to provide all notices to participants required under ERISA section 404(c)(5).
- Individualized Participant Advice – Upon request, Sequent Planning will provide one-on-one advice to Plan participants regarding their individual situations.

For Fiduciary Consulting Services, all recommendations of investment options and portfolios will be submitted to the company for ultimate approval or rejection. The Company or the plan participant who elects to implement any recommendations made by us is solely responsible for implementing all transactions.

Fiduciary Consulting Services are not management services, and Sequent Planning does not serve as administrator or trustee of the Plan. Sequent Planning does not act as custodian for any corporate or participant account or have access to corporate or participant funds or securities (except for written authorization from the company or participant to deduct our fees from accounts).

Sequent Planning acknowledges that in performing the Fiduciary Consulting Services listed above that it is acting as a “fiduciary” as such term is defined under Section 3(21)(A)(ii) of Employee Retirement Income Security Act of 1974 (“ERISA”), and will act in a manner consistent with the requirements of a fiduciary under ERISA, for purposes of providing non-discretionary investment advice only. However, in providing the Fiduciary Consulting Services, Sequent Planning:

- (a) has no responsibility and will not:
  - (i) exercise any discretionary authority or discretionary control respecting management of company’s retirement plan,
  - (ii) exercise any authority or control respecting management or disposition of assets of company’s retirement plan, or
  - (iii) have any discretionary authority or discretionary responsibility in the administration of company’s retirement plan or the interpretation of company’s retirement plan documents,
- (b) is not an “investment manager” as defined in Section 3(38) of ERISA and does not have the power to manage, acquire or dispose of any plan assets, and
- (c) is not the “Administrator” of company’s retirement plan as defined in ERISA.

#### Fiduciary Management Services

We offer to provide the following Fiduciary Management Services to retirement plans:

- Discretionary Management Services – Sequent Planning will provide the company with continuous and ongoing supervision over the designated retirement plan assets. Sequent Planning will actively monitor the designated retirement plan assets and provide advice regarding buying, selling, reinvesting or holding securities, cash or other investments of the Plan. We have discretionary authority to make all decisions to buy, sell or hold securities, cash or other investments for the designated retirement plan assets in our sole discretion without first consulting with the company. We also have the power and authority to carry out these decisions by giving instructions, on the company’s behalf, to brokers and dealers and the qualified custodian(s) of the Plan for our management of the designated retirement plan assets.
- Discretionary Investment Selection Services – Sequent Planning will monitor the investment options of the Plan and add or remove investment options for the Plan. Sequent Planning will

have discretionary authority to make all decisions regarding the investment options that will be made available to Plan participants.

- Default Investment Alternative Management – Sequent Planning will develop and actively manage qualified default investment alternative(s) (“QDIA”), as defined in DOL Reg. Section 2550.404c-5(e)(4)(i), for participants who are automatically enrolled in the Plan or who otherwise fail to make an investment election.

If the company elects to utilize any of Sequent Planning’s Fiduciary Management Services, then Sequent Planning will be acting as an Investment Manager to the Plan, as defined by ERISA section 3(38), with respect to our Fiduciary Management Services, and Sequent Planning hereby acknowledges that it is a fiduciary with respect to its Fiduciary Management Services.

#### Non-Fiduciary Services

We offer to provide the following Non-Fiduciary Consulting Services to retirement plans:

- Participant Education – Sequent Planning will provide education services to Plan participants about general investment principles and the investment alternatives available under the Plan. Sequent Planning’s assistance in participant investment education will be consistent with and within the scope of DOL Interpretive Bulletin 96-1. Education presentations will not take into account the individual circumstances of each Plan participant and individual recommendations will not be provided unless otherwise agreed upon. Plan participants are responsible for implementing transactions in their own accounts.
- Participant Enrollment – Sequent Planning will assist the company with group enrollment meetings designed to increase participation and increase investment and financial understanding of the Plan participants.
- Qualified Plan Development – Sequent Planning will assist the company with the establishment of a qualified plan by working with the company and a selected Third-Party Administrator (TPA). If the company has not already selected a Third-Party Administrator, we can assist the company with the review and selection of a TPA for the Plan.
- Due Diligence Review – Sequent Planning will provide periodic due diligence reviews of the Plan’s fees and expenses and your Plan’s service providers.
- Fiduciary File Set-up – Sequent Planning will help the company establish a “fiduciary file” for the Plan which contains trust documents, custodial/brokerage statements, investment performance reports, services agreements with investment management vendors, the investment policy statement, investment committee minutes, asset allocation/asset liability studies, due diligence fields on funds/money managers and monitoring procedures for funds and/or money managers.
- Benchmarking – Sequent Planning will provide benchmarking services and will provide analysis concerning the operations of the Plan.

We can also meet with individual Plan participants to discuss their specific investment risk tolerance, investment time frame and investment selections.

#### Retirement Plan Accounts & Conflicts of Interest

Our IARs can earn Advisory Fees related to retirement plan accounts in one of three ways:

1. You hire an IAR to provide advisory services related to your retirement plan account.
2. An IAR recommends that you transfer the retirement plan funds to an Individual Retirement Account (IRA).
3. You hire an IAR to provide advisory services to your retirement plan account and the IAR recommends that you transfer the retirement plan to an IRA. (both 1 and 2 above).

Prior to entering into any agreement with you, our IAR did not receive any Advisory Fees from you. After entering into an agreement with you, the IAR does receive Advisory Fees. The IAR is earning more fees after entering into an agreement with you. This economic incentive creates a conflict of interest under ERISA law. Sequent has taken steps to help manage this conflict of interest.

To the extent Sequent provides investment advice to a participant in a retirement plan under ERISA, Sequent hereby acknowledges its fiduciary obligations. As a fiduciary, our IARs will act with the care, skill, prudence, and diligence under the circumstances then prevailing that a prudent person acting in a like capacity and familiar with such matters would use in the conduct of an enterprise of a like character and with like aims, based on the investment objectives, risk, tolerance, financial circumstances, and a client's needs, without regard to the financial, personal or other self-interests of Sequent or our affiliated personnel.

#### Retirement Plan Rollover Recommendations

When Sequent provides investment advice about your retirement plan account or individual retirement account ("IRA") including whether to maintain investments and/or proceeds in the retirement plan account, roll over such investment/proceeds from the retirement plan account to a IRA or make a distribution from the retirement plan account, we acknowledge that Sequent is a "**fiduciary**" within the meaning of Title I of the Employee Retirement Income Security Act ("ERISA") and/or the Internal Revenue Code ("IRC") as applicable, which are laws governing retirement accounts. The way Sequent makes money creates conflicts with your interests so Sequent operates under a special rule that requires Sequent to act in your best interest and not put our interest ahead of you.

Under this special rule's provisions, Sequent must act as a fiduciary to a retirement plan account or IRA under ERISA/IRC by:

- meeting a professional standard of care when making investment recommendations (e.g., give prudent advice);
- never putting the financial interests of Sequent ahead of you when making recommendations (e.g., give loyal advice);
- avoiding misleading statements about conflicts of interest, fees, and investments;
- following policies and procedures designed to ensure that Sequent gives advice that is in your best interest;
- charging no more than is reasonable for the services of Sequent; and
- giving you basic information about conflicts of interest.

To the extent we recommend you roll over your account from a current retirement plan account to an individual retirement account managed by Sequent, please know that Sequent and our investment adviser representatives have a conflict of interest.

We can earn increased investment advisory fees by recommending that you roll over your account at the retirement plan to an IRA managed by Sequent. We will earn fewer investment advisory fees if you do not roll over the funds in the retirement plan to an IRA managed by Sequent.

Thus, our investment adviser representatives have an economic incentive to recommend a rollover of funds from a retirement plan to an IRA which is a conflict of interest because our recommendation that you open an IRA account to be managed by our firm can be based on our economic incentive and not based exclusively on whether or not moving the IRA to our management program is in your overall best interest.

We have taken steps to manage this conflict of interest. We have adopted an impartial conduct standard whereby our investment adviser representatives will:

- (i) provide investment advice to a retirement plan participant regarding a rollover of funds from the retirement plan in accordance with the fiduciary status described below,
- (ii) not recommend investments which result in Sequent receiving unreasonable compensation related to the rollover of funds from the retirement plan to an IRA, and
- (iii) fully disclose compensation received by Sequent and our supervised persons and any material conflicts of interest related to recommending the rollover of funds from the retirement plan to an IRA and refrain from making any materially misleading statements regarding such rollover.

### ***Administrative Services Provided by AdvisorEngine***

Sequent Planning has contracted with a third-party, AdvisorEngine, to receive access to software to utilize its technology platform, to support data reconciliation, performance reporting, fee calculation and billing, client database maintenance, quarterly performance evaluations, and other functions related to the administrative tasks of managing client accounts. AdvisorEngine's technology platform also includes a trade allocator, CRM, Model Marketplace, workflows, performance reporting, fee billing rebalancing platform and client portal.

Due to this arrangement, AdvisorEngine will have access to client accounts, however AdvisorEngine will not serve as an investment adviser to Sequent Planning clients, unless otherwise engaged as a Third-Party money manager under a TAMP as discussed above. Clients will not incur additional fees with our use of AdvisorEngine's administrative services.

### ***Investment Newsletters***

Sequent Planning provides to clients and prospective clients ongoing financial communications which may be purchased from a financial communications firm or created internally. Newsletters are always offered on an impersonal basis and do not focus on the needs of a specific individual.

### ***Educational Programs***

Sequent Planning offers educational and informative educational events to clients and prospective clients. The content for these programs may be developed internally or purchased from a financial communications firm. Workshops are offered on an impersonal basis and do not focus on the individual needs of the participants.

### **Advice on Certain Types of Investments**

Sequent Planning provides investment advice on the following types of investments:

- Mutual Funds
- Exchange Traded Funds (ETFs)
- Exchange-listed Securities
- Securities Traded Over-the-Counter
- Corporate Debt Securities
- Commercial Paper
- Certificates of Deposit
- Municipal Securities
- US Government Securities
- Interests in Partnerships Investing in Real Estate
- Non-Traded Real Estate Investment Trusts (REITs)

We reserve the right to offer advice on any investment product that may be suitable for each client's specific circumstances, needs, goals and objectives.

It is not our typical investment strategy to attempt to time the market, but we may increase or decrease cash holdings as deemed appropriate based on your risk tolerance and/or your risk capacity and our expectations of market behavior. We may modify our investment strategy to accommodate special situations such as low basis stock, stock options, legacy holdings, inheritances, closely held businesses, collectibles, or special tax situations.

*(Please refer to Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss for more information.)*

### **Tailor Advisory Services to Individual Needs of Clients**

Sequent Planning's advisory services are tailored to your individual needs. This means, for example, that when we provide asset management services, you are given the ability to impose restrictions on the accounts we manage for you, including specific investment selections and sectors. Our financial planning services are provided based on your individual financial situation. When providing asset management services and/or financial planning services, we work with you on a one-on-one basis through interviews and questionnaires to determine your investment objectives and suitability information.

We retain the right to refuse to work with you. Sequent will not enter into an investment adviser agreement with a prospective client whose investment objectives may be considered incompatible with our investment philosophy or strategies or where the prospective client seeks to impose unduly restrictive investment guidelines.

### **Participation in Wrap Fee Programs**

A wrap fee program as it applies to investment advisors, is defined as an advisory program which combines portfolio management and trade execution costs within a single investment management fee (it "wraps" the transactional expenses associated to the investment account into the Advisory Fee). A non-wrap fee program has a specific Advisory Fee and also charges the client directly for transactional expenses (an example would be transactional expense incurred to buy or sell a security). While Sequent Planning does combine its own portfolio management and financial planning fees together, we do not offer services through a wrap fee program as defined.

### **Client Assets Managed by Sequent Planning**

The amount of clients' assets managed by Sequent Planning totaled \$589,473,003 as of December 31, 2025. Of the total assets, \$528,445,847 are managed on a discretionary basis and \$61,027,156 are managed on a non-discretionary basis.

## **Item 5 – Fees and Compensation**

In addition to the information provided in *Item 4 – Advisory Business*, this section provides additional details regarding our firm's services along with descriptions of each service's fees and compensation arrangements. It should be noted that lower fees for comparable service may be available from other sources. The exact fees and other terms will be outlined in the asset management agreement between you and Sequent Planning.

Sequent Planning allows your IAR to set Advisory Fees within ranges provided by Sequent Planning. As a result, your IAR can charge more or less for the same service as another IAR of Sequent Planning.

### **Fees for Asset Management Services**

Fees charged for our asset management services ("Advisory Fee") are charged based on a percentage of Assets Under Management ("AUM"), billed in arrears, net of income, withholding or other taxes (at the end of the billing period) and deducted from your account on a quarterly calendar basis. The Advisory Fees are calculated based on the fair market value of your account as of the last business day of the

current billing period. Each quarter, the qualified custodian of your account sends or makes available to you an account statement that includes an Advisory Fee notification which shows the computed fee, any adjustments to the fee, an explanation of any adjustment and the net Advisory Fee to be deducted later in the period from your account.

Fees are prorated (based on the number of days service is provided during the initial billing period) for your account opened at any time other than the beginning of the billing period. If asset management services are commenced in the middle of the billing period, then the prorated fee for that billing period will be billed in arrears at the end of that billing period.

The asset management services continue until terminated by either party (i.e., Sequent Planning or you) by giving thirty (30) days written notice to the other party. When fees are billed in arrears, Sequent Planning will prorate the final fee payment based on the number of days services are provided during the final period. The amount of client assets on the termination date will be used to determine the final Advisory Fee payment amount.

Advisory Fees charged for our asset management services are negotiable based on the IAR providing the services, the type of client, the complexity of the client's situation, the composition of the client's account (i.e., equities versus mutual funds), the potential for additional account deposits, the relationship of the client with the IAR, and the total amount of assets under management for the client.

The annual Advisory Fee for asset management services will never exceed 1.75% (Advisory Fee Cap). Each advisor has the authority and discretion to price their advisory services; therefore, the annual Advisory Fee may fluctuate from advisor to advisor and from client to client.

Sequent Planning believes that its annual Advisory Fee is reasonable in relation to: (1) services provided and (2) the fees charged by other investment advisers offering similar services/programs. However, our annual Advisory Fee may be higher than that charged by other investment advisers offering similar services/programs.

In addition to the Advisory Fee, you may incur additional charges imposed by third parties other than Sequent Planning in connection with investments made through your account including, but not limited to mutual fund sales loads, internal expenses of the security which may include 12(b)-1 fees, surrender charges, variable annuity fees and surrender charges, IRA and qualified retirement plan fees, and custodian service charges. Advisory Fees charged by Sequent Planning are separate and distinct from the fees and expenses charged by the investment company that created and manages the mutual fund or exchange traded fund. A description of the fees and expenses charged on the investment are available in each investment prospectus.

The Advisory Fees are deducted from your account and paid directly to our firm by the qualified custodian(s) of your account. You will authorize the qualified custodian(s) of your account to deduct fees from your account and pay Advisor Fees directly to our firm. The billing statement will detail the formula used to calculate the Advisory Fee, the assets under management and the time period covered.

You should review your account statements received from the qualified custodian(s) and verify that appropriate Advisory Fees are being deducted. The qualified custodian(s) will not verify the accuracy of the Advisory Fees deducted.

### **Fees for Financial Planning Services**

Sequent charges for the time, energy and knowledge utilized to create your financial plan. Fees charged for our financial planning services are negotiable based upon the particular investment advisor representative working with client, the type of client (including prospective clients for marketing purposes), the complexity of the client's situation, the composition of the client's account (i.e., equities versus mutual

funds), the potential for additional account deposits, the relationship of the client with the investment advisor representative, the geographic location and the total amount of assets under management for the client (combined as “negotiable factors”).

Sequent provides financial planning services under either an hourly or fixed fee arrangement, as specified in the agreement. Each investment advisor representative has the authority to waive the financial planning fee. By signing an Asset Management Agreement with Sequent, we may offer to waive or reduce the fees for financial planning services.

At no time will Sequent Planning require payment of more than \$1,200 in fees more than six months in advance. The final fee schedule will be outlined in the Financial Planning Agreement. Clients may terminate their contracts without penalty within five business days of signing the Financial Planning Agreement. Lower fees for comparable services may be available from other sources.

### ***Hourly Fee***

Hourly fees are capped at \$500 per hour for either a limited-scope engagement or a financial planning engagement. The hourly rate is negotiable based upon the particular investment advisor representative working with client and the negotiable factors.

The actual hourly fee charged by Sequent Planning will be specified in the client's agreement with Sequent Planning.

### ***Fixed Fee***

A mutually agreed upon fixed fee is charged for financial planning services under this arrangement. The minimum fixed fee for a comprehensive financial plan is \$1,000 and the minimum fixed fee for a limited engagement is \$500. The maximum fixed fee is \$5,000. The amount of the fixed fee for your engagement is specified in your financial planning agreement with Sequent Planning.

### **Other Fee Terms**

Many of our IARs are also licensed insurance agents. If you elect to have your IAR, in his or her separate capacity as an insurance agent, implement the recommendations of the financial plan, your IAR will receive commissions on the insurance transactions in his or her role as insurance agent, in addition to the Advisory Fee received for providing advisory or financial planning services. All advisory fees paid to Sequent for services are separate and distinct from any insurance products sold.

All Advisory Fees paid to Sequent are separate and distinct from the fees and expenses charged by mutual funds to their shareholders. These fees and expenses are described in each mutual fund's prospectus. These fees will generally include a management fee, other fund expenses and a possible distribution fee. If the fund also imposes sales charges, you may pay an initial ongoing or deferred sales charge. Likewise, the qualified custodian or broker-dealer executing certain transaction will charge commissions for implementing transactions.

### **Fees for Turn-Key Asset Management Platforms**

TAMPs may involve additional fees. These fees may be separate from or, in addition to, Sequent Planning's fees for Asset Management Services where applicable. Advisors are responsible for clearly disclosing all applicable fees to clients and ensuring clients understand the overall cost structure prior to implementation.

### **Fees for Retirement Plan Services**

For retirement plan sponsors, Sequent Planning will charge an annual fee that is calculated as a percentage of the value of plan assets. This fee is negotiable based upon the complexity of the plan, the

size of the plan assets, the actual services requested, the representative providing the services and the potential for additional deposits.

The following tables for Non-Fiduciary and Fiduciary services show our list price for these services. Each Plan is different and therefore the final price can be negotiated by our IAR.

**Non-Fiduciary:**

<u>Plan Assets</u>		<u>Annual Fees</u>
\$ 0 - \$ 5,000,000	Tier 1	Up to 0.75%
\$5,000,001 – \$10,000,000	Tier 2	Tier 1 + 0.50% on Tier 2 balance
\$10,000,000+	Tier 3	Customized pricing

**Fiduciary:**

<u>Plan Assets</u>		<u>Annual Fees</u>
\$ 0 - \$ 5,000,000	Tier 1	Up to 1.00%
\$5,000,001 – 10,000,000	Tier 2	Tier 1 + 0.75% on Tier 2 Balance
\$10,000,000+	Tier 3	Customized pricing

The Annual fee is billed in arrears (at the end of the billing period) on a quarterly calendar basis and calculated based on the fair market value of the Plan as of the last business day of the current billing period. Fees are prorated (based on the number of days service is provided during the initial billing period) for Plans opened at any time other than the beginning of the billing period.

Advisory Fees will be deducted as directed by the retirement plan. Clients are required to provide the custodian or recordkeeper with written authorization to deduct the fees from the account and pay the fees to Sequent Planning.

Either party may terminate services by providing written notice of termination to the other party. If services are terminated within five business days of signing the retirement plan agreement, services are terminated without penalty.

Sequent Planning does not reasonably expect to receive any other compensation, direct or indirect, for the retirement planning services. If we receive any other compensation for such services, we will (i) offset that compensation against our stated fees, and (ii) will disclose to the company sponsor the amount of such compensation, the services rendered for such compensation and the payer of such compensation.

**Fees for Investment Newsletters**

Newsletters are provided to clients and prospective clients free of charge.

**Fees for Educational Programs**

Educational events, when offered, may charge a nominal fee for certain events, depending on the content covered and materials provided to clients. Clients will be notified of any fees associated with an educational event and fees will be charged and paid prior to the event date.

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

Sequent does not charge or accept performance-based fees. Performance-based fees are defined as fees based on a share of capital gains or capital appreciation of the assets held in a client's account.

## Item 7 – Types of Clients

Sequent Planning generally provides investment advice to the following types of clients:

- Individuals
- High net worth individuals
- Defined Benefit and Define Contribution Plans
- Small and Medium size Businesses
- Endowments
- Non-Profit Organizations

We require you to execute a written agreement with us specifying the particular advisory services in order to establish a client arrangement with Sequent Planning.

### **Minimum Investment Amounts Required**

Sequent does not have any minimum account requirements.

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

### **Methods of Analysis and Investment Strategies**

Sequent Planning uses the following investment strategies when managing client assets and/or providing investment advice:

- Long-term purchases (Investments held at least one year + one day),
- Short-term purchases (Investments sold within a year),
- Option strategies, including covered options, uncovered options or spreading strategies (Contracts giving the purchaser the right to buy or sell a security, such as stocks, at a fixed price within a specific period of time).

Sequent Planning offers certain investment models when suitable for clients based on the client investment and risk profile. The current Model list can be provided upon request. Client model selection is documented in the Asset Management Agreement

Sequent advisors utilize a structured yet flexible approach when formulating investment advice and managing client assets. Advisors are encouraged to follow Sequent's established standards of analysis while also enhancing the due diligence process to reflect their individual investment philosophies and expertise. This balance allows for consistency across the firm while supporting thoughtful, advisor-driven customization based on client needs and meeting our fiduciary duty.

In general, Sequent follows a three-step process that begins with client engagement and discovery. The primary objective of this phase is to help clients establish an appropriate risk framework. Sequent defines risk through a three-pronged lens: (1) the client's ability or capacity to take on risk, (2) the client's willingness or emotional tolerance for risk, and (3) other relevant circumstances, such as insurance coverage, financial obligations, and unique personal factors. This holistic understanding of risk informs portfolio construction and ongoing investment decisions.

When analyzing investments, Sequent emphasizes that all securities involve a risk of loss, and clients should be prepared to bear that risk. As an initial requirement, all investments must be available on the custodian's platform, which provides a foundational level of due diligence. Beyond this baseline, Sequent conducts additional analysis using a framework that incorporates both quantitative metrics and qualitative factors, such as manager experience, investment process, consistency, and organizational stability. Sequent seeks to maintain a diverse range of investment strategies and philosophies within client portfolios. These may include, but are not limited to, macro and micro approaches, thematic and strategic

allocations, dynamic and core-satellite structures, as well as bottom-up and top-down methodologies. Additional styles may include fundamental, technical, momentum, factor-based, and contrarian strategies. By incorporating a variety of approaches, Sequent aims to reduce correlations among investments, recognizing that different strategies may perform differently across market cycles. This diversification is intended to help manage overall portfolio volatility and mitigate downside risk over time.

### **Investment Strategies and Material Risks**

Sequent utilizes a range of investment strategies and methods of analysis, each of which involves material risks that clients should carefully consider. These risks include, but are not limited to:

- market risk (the potential for investments to decline due to broad market movements),
- interest rate risk (the impact of changing interest rates on fixed income and other interest-sensitive assets),
- systemic risk (the possibility of disruption within the financial system),
- currency risk (fluctuations in foreign exchange rates affecting international investments), and
- tax risk (changes in tax laws or the tax treatment of investments).

Clients should understand that all investment strategies involve the potential for loss, and there is no guarantee that any strategy will achieve its intended objective.

For clients who meet the qualifications of accredited investors or qualified purchasers, Sequent may incorporate alternative investments such as hedge funds, managed futures, real assets, private equity, and private credit. These strategies often involve significant or unique risks, including limited liquidity, extended lock-up periods, reduced transparency, higher fees, and complex structures. As such, they may not be suitable for all clients and require careful evaluation within the context of the client's overall financial situation and risk tolerance.

Sequent also considers the tax implications of investment strategies when constructing portfolios. Strategies involving frequent trading may lead to increased brokerage and transaction costs, which can negatively impact overall investment performance. Additionally, higher portfolio turnover in taxable accounts may generate short-term capital gains, which are typically taxed at higher rates than long-term gains, thereby increasing tax drag. To help manage these effects, Sequent generally recommends placing higher-turnover or actively traded strategies in tax-advantaged (qualified) accounts, while utilizing lower-turnover, buy-and-hold approaches in taxable accounts. These guidelines are intended to enhance after-tax returns and improve overall portfolio efficiency.

### **Primarily Recommend One Type of Security**

We do not primarily recommend one type of security to clients. Instead, we recommend any product that may be suitable for each client relative to that client's specific circumstances and needs.

We do primarily recommend the use of third-party investment managers, either through pre-constructed model portfolios or customized blends of managers tailored to client objectives. These approaches allow Sequent to leverage specialized expertise across a range of investment styles and asset classes while maintaining flexibility in portfolio construction. The primary types of securities utilized within these strategies include, but are not limited to: equities, fixed income securities (bonds), exchange-traded funds (ETFs), and mutual funds.

### **Risk of Loss**

You should be aware that all investments carry the potential for loss and that diversification does not guarantee a profit or protect against loss. Further, depending on the different types of investments there may be varying degrees of risk. Past performance is not indicative of future results. Therefore, you

should never assume that future performance of any specific investment or investment strategy will be profitable. You should be prepared to bear investment loss including loss of original principal.

Each type of security offered involves material risks that clients should understand.

- Equity investments are subject to market risk, including fluctuations in value due to company-specific developments or broader economic conditions.
- Fixed income securities are subject to interest rate risk, credit risk (the risk that an issuer may default), and inflation risk, all of which can impact returns and principal value.
- ETFs and mutual funds, while offering diversification, are also subject to market risk and may carry additional risks depending on their underlying holdings and investment strategies.
- ETFs may experience trading-related risks, including price deviations from net asset value and liquidity concerns in certain market conditions, while mutual funds may be subject to management risk and may have limitations on liquidity or redemption timing.

**Past performance is not a guarantee of future returns. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

### **Item 9 – Disciplinary Information**

Sequent has nothing to report in Item 9. There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of our business or integrity.

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

Sequent Planning is **not** and does **not** have a related person that is a broker/dealer, municipal securities dealer, government securities dealer or broker, an investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund), a futures commission merchant, commodity pool operator, or commodity trading advisor, a banking or thrift institution, an accountant or accounting firm, a lawyer or law firm, a pension consultant, a real estate broker or dealer, and a sponsor or syndicator of limited partnerships.

We are an independent registered investment adviser that provides investment advisory services. We are not engaged in any other business activities and offer no other services, and do not receive fees for other services, except those described in this Disclosure Brochure. However, while Sequent does not sell products or services other than investment advice and services, our IARs can offer other services. Many of our advisers also serve as insurance agents who sell other products or provide services outside of their role as IARs with us. We may have IARs that are also a registered representative with a broker dealer. These activities are known as approved "Outside Business Activities" (OBAs). Each IAR discloses to you their OBAs on the ADV Part 2B form.

#### Insurance Agent

Many of our IARs are also insurance agents. You may work with the same person in the capacity of an IAR and in the capacity of an insurance agent. An IAR and an insurance agent are paid differently. When acting in his or her separate capacity as an insurance agent, an IAR will sell, for commissions, general disability insurance, life insurance, annuities, and other insurance products to you. An insurance agent can suggest that you implement recommendations of Sequent by purchasing an insurance product. The insurance agent will be compensated through the payment of commissions by the insurance agency. This commission creates an incentive for the IAR to recommend those products. Consequently, the

advice rendered to you could be biased. You are under no obligation to implement any insurance or annuity transaction through your IAR.

Some of our IARs are insurance agents associated with insurance agencies that are under common ownership with Sequent Planning. Clients of Sequent Planning may be referred to these agencies for insurance products and services. You should be aware that a conflict of interest exists between our interests and your interests. You are under no obligation to act on our recommendations and, if you do, you are under no obligation to affect any insurance transactions through Futurity First Insurance Group.

#### Senior Market Sales, Inc.

As Vice President of Senior Market Sales (SMS) and Managing Principal of Sequent Planning, Chelsea Kiehler is responsible for overseeing advisory services, including the selection and monitoring of third-party managers, platforms, and investment strategies, as well as supervising advisor activities and ensuring adherence to firm policies and regulatory requirements. In this capacity, Chelsea Kiehler may be involved in evaluating and approving TAMP providers and model portfolios made available to advisors and clients. Potential conflicts of interest may arise to the extent that certain platforms or managers provide economic or non-economic benefits to the firm, such as revenue sharing, marketing support, or other incentives. Additionally, as both a supervisory and advisory professional, Chelsea Kiehler may influence platform or manager selection while also benefiting from firm revenue associated with assets managed on those platforms. Sequent Planning addresses these conflicts through its due diligence process, supervisory controls, and commitment to acting in the best interests of clients, with full and fair disclosure provided as required.

#### Alliant Retirement Services

Alliant Retirement Services is an investment adviser and under common control with Sequent Planning. Alliant Retirement Services and Sequent Planning are not affiliated entities.

#### Turn-Key Asset Management Platforms (TAMPs)

As previously described in *Items 4 and 5* of this disclosure brochure, Sequent utilizes TAMPs to provide you with access to third-party asset managers and model portfolios. Once selected, the third-party money manager may pay us a portion of the Advisory Fees you are charged. Receiving direct or indirect compensation for the management of assets by third-party asset managers creates a material conflict of interest, because Sequent has an incentive to place assets based on compensation. Sequent addresses this material conflict of interest through a process of placing assets solely on the suitability information provided by the client and documented on account applications. The investment advisor representative will monitor the client's investments, and whether or not those investments are reflective of the risk tolerance, time horizon, and investment objective of the account. Please refer to *Items 4 and 5* for full details regarding the programs.

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

#### **Code of Ethics Summary**

Sequent Planning has adopted a Code of Ethics in accordance with SEC requirements that sets standards for ethical conduct and personal trading by its employees. The Code is designed to ensure that all Supervised Persons act in the best interests of clients and comply with applicable laws and regulations. All employees, officers, directors and IARs are classified as "Supervised Persons". The Code of Ethics also includes policies related to personal securities transactions and the handling of potential conflicts of interest. A copy of the Code of Ethics is available to any client or prospective client upon request.

### **Supervised Persons and Affiliates Personal Securities Transactions Disclosure**

Sequent Planning's Code of Ethics requires that all Supervised Persons must place clients' interests ahead of their own when implementing personal investments. Sequent Planning permits supervised persons to invest in the same securities, or related securities, which may be recommended to clients; however, this practice presents a potential conflict of interest. To address this, the firm has implemented policies and procedures designed to ensure that client interests are placed first. These include transaction reporting and ongoing monitoring of employee accounts. Supervised persons are prohibited from engaging in trading that could disadvantage clients, including front-running or using material non-public information, and are required to adhere to the firm's Code of Ethics at all times.

### **Item 12 – Brokerage Practices**

Clients are under no obligation to act on the financial planning recommendations of Sequent Planning. If the firm assists in the implementation of any recommendations, we are responsible for ensuring that the client receives the best execution possible by exercising reasonable due diligence in considering the back-office services, technology and pricing of services offered.

Best execution does not necessarily mean that clients receive the lowest possible commission costs but that the qualitative execution is within the "best" definition (all conditions considered, the transaction execution is in your best interest). When considering best execution, we look at a number of factors of our execution partner besides prices and fees including, but not limited to:

- Execution capabilities (e.g., market expertise, ease/reliability/timeliness of execution, responsiveness, integration with our existing systems, ease of monitoring investments)
- Products and services offered (e.g., investment programs, back-office services, technology, regulatory compliance assistance, research and analytic services)
- Financial strength, stability and responsibility
- Reputation and integrity
- Ability to maintain confidentiality.

Sequent Planning is not required to select the broker or dealer that charges the lowest transaction cost, even if that broker provides execution quality comparable to other brokers or dealers. We have determined that having Charles Schwab & Co., Inc. execute all trades is consistent with our duty to seek "best execution" of your trades as the most favorable terms for a transaction based on all relevant factors, including those listed above. By using another broker or dealer, you may pay lower or higher transaction costs.

### **Brokerage Recommendations and Custodians**

If you sign an asset management agreement, you are required to establish a brokerage account with a qualified custodian. We recommend the following qualified custodian:

Charles Schwab & Co, Inc. ("Schwab")

Clients may establish brokerage accounts with qualified custodian Charles Schwab & Co., Inc ("Schwab"), a FINRA-registered broker-dealer, member SIPC, to maintain custody of clients' assets and to effect trades for their accounts. Although Sequent Planning may recommend the clients establish accounts at Schwab, it is the client's decision to custody assets with Schwab. We are independently owned and operated and not affiliated with Schwab.

Schwab will hold your assets in a brokerage account and buy and sell securities when instructed by us. Considerations for choosing Schwab include, but are not limited to, financial strength, pricing,

technology, execution, and reliability. Transaction fees charged by Schwab may be higher or lower than those charged by other broker-dealers.

For clients' accounts that Schwab maintains, Schwab generally does not charge you separately for custody services but is compensated by charging commissions or other fees on trades that it executes or that settle into the Schwab account. Certain trades (for example, mutual funds and ETFs) do not incur Schwab commissions or transaction fees. Schwab is also compensated by earning interest on the uninvested cash in the account in Schwab's Cash Features Program.

- Products and services available to Sequent Planning from Schwab

Schwab Advisor Services™ is Schwab's business serving independent investment advisory firms like us. They provide our clients and us with access to their institutional brokerage services (trading, custody, reporting and related services), many of which are not typically available to Schwab retail customers.

However, certain retail investors may be able to get institutional brokerage services from Schwab without going through us. Schwab also makes available various support services. Some of those services help us manage or administer our clients' accounts, while others help us manage and grow our business.

Some of these services are provided at no cost as an independent firm. Some of these services are provided at a discount or at waived fees depending on the level of assets under management with Schwab. This may be perceived as a conflict of interest. In order to mitigate the risk of this conflict, Sequent Planning has the option to choose other third-party vendors for these services.

### **Soft Dollar Benefits**

An investment adviser receives soft dollar benefits from a broker-dealer when the investment adviser receives research or other products and services in exchange for client securities transactions or maintaining an account balance with the broker-dealer.

Sequent Planning does not currently have soft dollar arrangements with broker-dealers and/or third-party service providers.

### **Directed Brokerage**

Clients should understand that not all investment advisors require the use of a particular broker/dealer or custodian. Some investment advisors allow their clients to select whichever broker/dealer the client decides. By requiring clients to use a particular broker/dealer or custodian, Sequent Planning may not achieve the most favorable execution of client transactions and the practice requiring the use of specific broker/dealers may cost clients more money than if the client used a different broker/dealer or custodian. However, for compliance and operational efficiencies, Sequent Planning has decided to require our clients to use broker/dealers and other qualified custodians determined by Sequent Planning.

### **Handling Trade Errors**

Sequent Planning has implemented procedures designed to prevent trade errors; however, trade errors in client accounts cannot always be avoided. Consistent with its fiduciary duty, Sequent Planning will correct trade errors in a manner that is in the best interest of the client. In cases where the client causes the trade error, the client is responsible for any loss resulting from the correction. Depending on the specific circumstances of the trade error, the client may not be able to receive any gains generated as a result of the error correction. In all situations where the client does not cause the trade error, the client is made whole and any loss resulting from the trade error is absorbed by Sequent Planning. If the error is caused by the broker-dealer, the broker-dealer is responsible for handling the trade error. If an investment gain results from the correcting trade and the correcting trade involves more than one client

account, Sequent will prorate the gains to those clients' accounts. Sequent Planning will never benefit or profit from trade errors.

### **Block Trading Policy**

We can elect to purchase or sell the same securities for several clients at approximately the same time. This process is referred to as aggregating orders, batch trading or block trading and is used by our firm when we believe it is advantageous to clients. If and when we aggregate client orders, allocating securities among client accounts is done on a fair and equitable basis. Typically, the process of aggregating client orders is done in order to achieve better execution, to negotiate more favorable commission rates, or to allocate orders among clients on a more equitable basis in order to avoid differences in prices and transaction fees or other transaction costs that might be obtained when orders are placed independently.

Sequent Planning uses the pro rata allocation method (an allocation of the trade at issue among applicable advisory clients in amounts that are proportional to the participating advisory client's intended investable assets) for transaction allocation. Under this method, Sequent Planning will calculate the pro rata share of each transaction included in a block order and assign the appropriate number of shares of each allocated transaction executed for the client's account.

If and when we determine to aggregate client orders for the purchase or sale of securities, including securities in which Sequent Planning or our associated persons may invest, we will do so in accordance with the parameters set forth in the SEC No-Action Letter, *SMC Capital, Inc.* Neither we nor our Supervised Persons receive any additional compensation as a result of block trades.

### **Agency Cross Transactions**

Our Supervised Persons are prohibited from engaging in agency cross transactions. We cannot act as brokers for both the sale and purchase of a single security between two different clients. Further, we cannot receive compensation in the form of an agency cross commission or principal mark-up for the trades.

## **Item 13 – Review of Accounts**

### **Account Reviews and Reviewers**

Account reviews will include investment strategy and objectives review and making a change if strategy and objectives have changed. Reviews are conducted by the relevant IARs, with reviews performed in accordance with your investment goals and objectives. Client accounts are reviewed at least annually. While the calendar is the main triggering factor, reviews can also be conducted at your request.

Our financial planning services terminate upon the presentation of the written plan. Our financial planning services do not include monitoring the investments of your account(s), and therefore, there is no ongoing review of your account(s) under such services.

### **Statements and Reports**

For our asset management services, you are provided, upon request, with transaction confirmation notices and regular quarterly account statements directly from the qualified custodian.

Whether reports by a third-party manager are provided directly to you will depend upon the money manager.

Financial planning clients receive the written plan originally contracted for and provided by Sequent Planning.

You are encouraged to compare any reports or statements provided by Sequent Planning or the third-party money manager against the account statements delivered from the qualified custodian. When you have questions about your account statement, you should contact our firm and the qualified custodian preparing the statement.

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

Sequent Planning has the ability to enter into arrangements with affiliated and non-affiliated parties (Referring Parties) who refer clients to Sequent Planning.

Sequent can pay a Referring Party when a prospective client is referred to us. The payment amount is determined by taking into consideration the following items: 1) is Referring Party a registered or non-registered agent, 2) size of the advised account AUM, 3) complexity of the account, 4) recurring nature of referrals and 5) other situational items. The referral fee schedule is as follows:

- Registered Advisor - % of AUM or Flat Fee(s)
- Non-Registered Agent – Flat Fee(s)

The referral relationship payments will not result in clients being charged any fees over and above the normal Advisory Fees charged for the advisory services provided.

When a client is referred to us by a Referring Party, the Referring Party provides the client with a copy of our Disclosure Brochure as required by the Investment Advisers Act of 1940. The client will complete and sign a Solicitor's Disclosure Statement document. If the Referring Party is an unaffiliated registered investment adviser firm, then the client will also receive a copy of the referring party's Form ADV Part 2A Disclosure Brochure.

Please see *Item 5, Fees and Compensation, Item 10, Other Financial Industry Activities and Affiliations and Item 12, Brokerage Practices*, for additional discussion concerning other compensation.

#### **Expense Reimbursement**

We can from time to time receive expense reimbursement for travel and/or marketing expenses from distributors of investment and/or insurance products. Travel expense reimbursements are typically a result of attendance at due diligence and/or investment training events hosted by product sponsors.

Marketing expense reimbursements are typically the result of informal expense sharing arrangements in which product sponsors may underwrite costs incurred for marketing such as client appreciation events, advertising, publishing, and seminar expenses. Although receipt of these travel and marketing expense reimbursements are not predicated upon specific sales quotas, the product sponsor reimbursements are typically made by those sponsors for which sales have been made or for which it is anticipated sales will be made. This creates a conflict of interest in that there is an incentive to recommend certain products and investments based on the receipt of this compensation instead of what is in the best interest of our clients. We attempt to control this conflict by always basing investment decisions on the individual needs of our clients.

#### **Item 15 – Custody**

Custody, as it applies to investment advisors, is defined as holding, directly or indirectly, client funds or securities, or having any authority to obtain possession of them. This definition also applies to our affiliated persons, in connection with advisory services we provide to clients, when applicable. Custody is not limited to physically holding client funds and securities. If an investment adviser has the ability to access or control client funds or securities, the investment adviser is deemed to have custody and must ensure proper procedures are implemented.

Your qualified custodian will directly debit your account(s) for the payment of our advisory fees. This ability to deduct our advisory fees from your accounts causes Sequent to exercise limited custody over your funds or securities. We do not have physical custody of any of your funds and/or securities. Your funds and securities will be held with one or more qualified custodians. You will receive account statements from the 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. You should carefully review account statements for accuracy.

#### **Additional Custodian Information**

The custodian(s) you choose to open an account with depends on which of our asset management and/or advisory services you have engaged with us. The qualified custodian may charge a separate custodial fee for the custody services it provides to your account.

Our custodians make available to Sequent Planning other products and services that we benefit from but may not benefit your accounts. Some of these other products and services assist us in managing and administering client accounts. These include software and other technology that:

- Provide access to client account data (such as trade confirmation and account statements)
- Facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts)
- Provide research, pricing information and other market data
- Facilitate payment of our fees from client accounts
- Assist with back-office functions, recordkeeping and client reporting

Many of these services generally may be used to service all or a substantial number of our accounts. The custodians also make available other services intended to help us manage and further develop our business. These services may include:

- Consulting, publications and conferences on practice management
- Information technology
- Business succession
- Regulatory compliance
- Marketing

In addition, our custodians make available, arrange and/or pay for these types of services rendered to Sequent Planning by independent third parties providing these services to us. As a fiduciary, we endeavor to act in your best interest. Our requirement that you maintain your assets in accounts at a qualified custodian may be based in part on the benefit to us of the availability of some of the foregoing products and services and not solely on the nature, cost or quality of custody and brokerage services provided by the custodian.

We benefit from the products and services provided because the cost of these services would otherwise be borne directly by us, and this creates a conflict and may indirectly influence Sequent Planning's choice for custody and brokerage services. You should consider these conflicts of interest when selecting a custodian.

#### **Item 16 – Investment Discretion**

When providing asset management services, Sequent Planning maintains trading authorization over your Account. We can provide asset management services on a **discretionary** basis. When discretionary authority is granted, we will have the authority to determine the type of securities and the amount of securities that can be bought or sold for your portfolio without obtaining your consent for each transaction.

If you decide to grant trading authorization on a **non-discretionary** basis, we will be required to contact you prior to implementing changes in your account. Therefore, you will be contacted and required to accept or reject our investment recommendations including:

- The security being recommended
- The number of shares or units
- Whether to buy or sell

Once the above factors are agreed upon, we will be responsible for making decisions regarding the timing of buying or selling an investment and the price at which the investment is bought or sold. If your accounts are managed on a non-discretionary basis, you need to know that if we are not able to reach you or you are slow to respond to our request, it can have an adverse impact on the timing of trade implementations and we may not achieve the optimal trading price.

You will have the ability to place reasonable restrictions on the types of investments that may be purchased in your Account. You may also place reasonable limitations on the discretionary power granted to Sequent Planning so long as the limitations are specifically set forth or included as an attachment to the asset management agreement.

Clients will grant Sequent Planning discretionary authority to establish and/or terminate a relationship with a Third-Party Money Manager for purposes of managing the Account or a portion of the Account determined by Sequent Planning. Client will also grant the Third-Party Money Manager selected by Sequent Planning with the discretionary authority (in the sole discretion of the Third-Party Money Manager without first consulting with Client) to make all decisions to buy, sell or hold securities, cash or other investments for such portion of the Account managed by the Third-Party Money Manager. Client will also grant the Third-Party Money Manager selected by Sequent Planning with the power and authority to carry out these decisions by giving instructions, on behalf of Client, to brokers and dealers and the qualified custodian(s) of the Account.

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

Sequent Planning does not vote proxies on behalf of Clients. We have determined that taking on the responsibilities for voting client securities does not add enough value to the services provided to you to justify the additional compliance and regulatory costs associated with voting client securities. Therefore, it is your responsibility to vote all proxies for securities held in your Account.

You will receive proxies directly from the qualified custodian or transfer agent; we will not provide you with the proxies. You are encouraged to read through the information provided with the proxy-voting documents and make a determination based on the information provided.

With respect to assets managed by a third-party money manager, you will need to refer to each third-party money manager's disclosure brochure to determine whether the third-party money manager will vote proxies on your behalf. You may request a complete copy of third-party money manager's proxy voting policies and procedures as well as information on how your proxies were voted by contacting the third-party money manager.

#### **Item 18 – Financial Information**

Sequent Planning does not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance. Therefore, we are not required to include a balance sheet for the most recent fiscal year. We are not subject to a financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients. Sequent Planning has not been the subject of a bankruptcy petition at any time.