

### 1. Introduction

- <u>Type of Advisor</u>: Vita Planning Group, LLC is an SEC Registered Investment Adviser. It is important for you as a retail investor to understand how advisory and brokerage services and fees differ to determine which type of account is right for you.
- <u>Resources</u>: There are free and simple tools available to assist you in researching firms and financial professionals at <u>investor.gov/CRS</u>. This resource also provides educational materials about investment advisors, broker-dealers, and investing.

## 2. What investment services and advice can you provide?

- <u>Types of Services Provided</u>: As an SEC registered investment adviser, we manage client assets by providing advisory services to retirement plans subject to the Employee Retirement Income Security Act of 1974 ("ERISA"), 457 plans and 403(b) plans not covered under ERISA. We also provide tailored asset management services and financial planning services for individuals.
- <u>Monitoring</u>: As part of our services, we will monitor your account on a regular basis and meet with you at least annually to review your portfolio and your business/life circumstances.
- <u>Discretionary Authority</u>: We manage client assets on either a discretionary or non-discretionary basis. With discretion you grant us the authority to determine the securities and amount to be bought or sold without your consent prior to each trade, (considering any restrictions placed on the account, if applicable). Without discretion *you* make the ultimate decision regarding the purchase or sale of investments. You will sign an investment management agreement that either gives us discretionary authority or limits our discretion through a non-discretionary arrangement. This agreement will remain in place until you or we change the agreement or terminate our relationship.
- <u>Additional Information</u>: Please refer to our Form ADV, Part 2A Firm Brochure (Items 4 and 7 of Part 2A for a more detailed description of our investment advisory services).
- Questions to Ask Us: Given my financial situation, should I choose an investment advisory service? Why or why not? How will you choose investments to recommend? What is your relevant experience, including your licenses, education, and other qualifications? What do these qualifications mean?

# 3. What fees and costs will I pay?

• Retirement Plan Clients: If you are a retirement plan client and you sign a Retirement Plan Investment Advisory Consulting Agreement, you will pay us an asset-based fee based upon a percentage (%) of included plan assets as reported by the plan custodian or recordkeeper, or you may have an option to pay on a flat fee or hourly rate basis. If you sign a Discretionary Advisory Agreement (managed account), you will pay us an asset-based fee, based upon an agreed annual percentage rate, generally referred to as an AUM fee. Asset-based fees are assessed in arrears based on either the market value of the assets on the last business day of the fee period, or as an average daily balance during the fee period, as specified in the Retirement Plan Investment Advisory Agreement or Discretionary Advisory Agreement. You may authorize the plan custodian to automatically deduct the fee from the account. The plan or the plan sponsor of the plan, or you as the client may choose to pay the fee, in which case fees are due and payable within 30 days of the invoice date. Our fees do not vary based on the type of investment. If paid from the advisory account or plan assets, our fees reduce your investable assets and will be deducted from your account. The more assets you have in the plan or advisory account, including cash, the more you will pay. This is a conflict of interest as it creates an incentive to increase the assets in your account in order to increase our fees. Fees and costs affect the value of your account over time. Please ask your financial professional to give you personalized information on the fees and costs that you will pay. For Financial planning we charge an hourly rate, which may be negotiable.



- <u>Individual Investment Clients</u>: If you are in individual investment advisory client, you will pay a quarterly management fee and no transaction-based commissions. You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce the amount of money you make over time. Please make sure you understand what fees and costs you are paying.
- Additional Information: Some investments such as mutual funds impose additional fees that will
  reduce the value of your investment over time. Our fees vary based on assets and services provided
  and are negotiable. We may pass additional charges, from our Clearing Firm or the Plan
  recordkeeper, on to you such as transaction fees, custodial fees, account maintenance fees, and
  account inactivity fees. Additional information about our fees is located in Item 5 of our Firm
  Brochure. Our Firm Brochure is available upon request or online at adviserinfo.sec.gov.
- Questions to Ask Us: Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will you invest for me?

# 4. What are your legal obligations acting as my investment advisor? How else does your firm make money and what conflicts of interest do you have?

- <u>Duty as Investment Adviser</u>: When acting as your investment advisor, we have a fiduciary duty to act in your best interest, to place your interests ahead of our own, and to operate under best execution principles. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Additional information about our conflicts of interest can be found in our Firm Brochure (Item 11) which is available upon request or online at https://adviserinfo.sec.gov/.
- Questions to Ask Us: How might your conflicts of interest affect me, and how will you address them?

## 5. How do your financial professionals make money?

- <u>Salaried Professionals</u>: Our investment advisor representatives are salaried professionals. Our firm receives a monthly or quarterly fee based upon your account's market value. The fee will increase as your account value increases and decreases if your account value decreases. Managed accounts are not charged any commissions, so the investment advisor only receives the quarterly fee.
- <u>Difference in Fee Types</u>: It is important to understand the differences between a brokerage commission-based account and an asset-based fee account. Use an *asset-based* fee if you want continuing advice or want someone to make investment decisions for you, even though it may cost more than a transaction-based fee. Use a *transaction-based* fee for lower costs, if you are an investor who does not trade often or if you plan to buy and hold investments for longer periods of time.

# 6. Do you or your financial professionals have legal or disciplinary history?

• <u>No Disciplinary History</u>: Neither our firm nor our financial professionals have any legal or disciplinary history. Visit <u>investor.gov</u> for a free and simple tool to research our firm and financial professionals.

#### 7. Additional Information

- <u>Information Sources</u>: Additional information can be found on our website, <u>vita401k.com</u>, at <u>investor.gov</u>, or at <u>brokercheck.finra.org</u>. You may also request additional information by calling us at (650) 567-9300. We encourage you to seek additional information.
- <u>To Report a Problem</u>: For SEC problems, visit <u>investor.gov</u> or call the SEC's toll-free investor assistance line at (800) 732-0330. For FINRA problems visit, <u>finra.org/investors/file-complaint</u>. For problems with your investments, account, or financial professional, contact us in writing or call 650-567-9300.
- Questions to Ask Us: Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?