

# Juetten

Personal Financial Planning

A Washington Registered Investment Adviser

13605 SE 50th Place  
Bellevue, WA 98006  
(425) 373-9393

[www.finpath.com](http://www.finpath.com)

Form ADV Part 2  
April 4, 2011

This brochure provides clients and prospective clients with information about Juetten Personal Financial Planning, LLC and the qualifications, business practices, and nature of its services that should be carefully considered before becoming an advisory client.

The contents of this brochure have not been approved or verified by the Securities and Exchange Commission (SEC) or any other state or federal authority. While the firm is an investment adviser registered with the State of Washington, registration alone does not imply a certain level of skill or training on the part of the firm or its associated personnel.

Questions relative to the firm, staff, its services, or this ADV Part 2 may be made to the attention of Mr. Juetten at (425) 373-9393. Additional information about the firm, other advisory firms, or an associated representative is available at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Material Changes**

Juetten Personal Financial Planning, LLC amended Sections 1 and 2 (*Advisory Business* and *Fees and Compensation*, respectively) of Form ADV Part 2 dated February 12, 2011 due to a change in the firm's selected sub-adviser engaged to support its model portfolios through the Group Ongoing Investment Management Services offering. This change of sub-adviser has resulted in a revised fee structure that current Group Ongoing Investment Management Services participants should take into consideration.

For future filings this section of the brochure may address only those material changes that have been incorporated since the firm's last annual update. The firm may at any time update this document and either send a copy of its updated brochure or provide a summary of material changes to its brochure and an offer to send an electronic or hard copy form of the updated brochure. Investors are also able to download this brochure from the SEC's Website: [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) or you may contact our firm at (425) 373-9393.

## **Table of Contents**

**Section 1 - Advisory Business**

**Section 2 - Fees and Compensation**

**Section 3 - Performance-Based Fees and Side-By-Side Management**

**Section 4 - Types of Clients**

**Section 5 - Methods of Analysis, Investment Strategies and Risk of Loss**

**Section 6 - Disciplinary Information**

**Section 7 - Other Financial Industry Activities and Affiliations**

**Section 8 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

**Section 9 - Brokerage Practices**

**Section 10 - Review of Accounts**

**Section 11 - Client Referrals and Other Compensation**

**Section 12 - Custody**

**Section 13 - Investment Discretion**

**Section 14 - Voting Client Securities**

**Section 15 - Financial Information**

**Section 16 - Advisory Personnel (Part 2B)**

Throughout this document, Juetten Personal Financial Planning, LLC will be referred to by the following terms: "the firm," "we," "us," or "our." The client or prospective client will also be referred to as well as "you," "your," etc.

***This brochure contains 22 pages, including Section 16 - Advisory Personnel information.***

***This document is not complete without all pages.***

## **Section 1 - Advisory Business**

### Introduction to Our Firm

Juetten Personal Financial Planning, LLC is a registered investment adviser domiciled in the State of Washington that provides portfolio management, financial planning and investment consulting services on a *fee-only* basis. In addition to our firm's original registration in 2002 as an investment adviser within Washington, Juetten Personal Financial Planning, LLC and our associates may register or meet certain exemptions to registration in other states in which we conduct business. Steve Juetten is the majority shareholder of the firm and his information is provided in further detail in Section 16 of this document.

"Fee-only" means that we do not sell any financial products; we offer our advice and services. This is different than others that receive commissions on the sale of an investment or insurance product. We provide these fee-only services to individuals, trusts, estates and charitable organizations.

Approximately 60% of our work is oriented toward consulting with our clients with respect to their investments; 40% involving financial planning that may involve expense budgeting and savings; education, insurance, charitable and estate planning, among others. Currently, we have no client assets under our management.

### The Fiduciary Standard

Juetten Personal Financial Planning, LLC holds itself to a *fiduciary standard*, which means our firm and its associates will act in the utmost good faith and perform in a manner believed to be in the best interest of our clients. As investment advisers we are required to put you - the client – first. We feel this sets us apart from other firms that may be held to a, perhaps lesser, "suitability" standard and may not be required under current regulation to place clients' interests ahead of their own or to disclose their conflicts of interest involving their clients' transactions.

### Our Services

Juetten Personal Financial Planning, LLC offers the following types of services:

- Broad-based (sometimes termed comprehensive) financial planning;
- Planning related to one or a few personal finance topics, for example, college funding, home purchase, investment or retirement planning; and
- Ongoing investment management.

The delivery of these services is either in a custom manner (i.e., one-on-one meetings with you) or through a group program. Group Comprehensive Financial Planning is delivered through a webinar series that you will pay a fee to attend. The Group Ongoing Investment Management is offered through model portfolios provided by Loring Ward, which we will describe in greater detail in following sections.

Through these various methods you may engage our firm for either general financial planning or ongoing investment management services -- or both.

Another way to envision the service delivery options is in this table:

<b>Service</b>	<b>Custom</b>	<b>Group</b>
Comprehensive Financial Planning	X	X
Planning related to a single topic	X	N/A
Ongoing investment management	X	X

### ***General Financial Planning Services***

You may receive general financial planning services either through one-on-one discussion with an associate or participate in a group financial planning service provided via a series of webinars. A comprehensive, or more broad-based, financial plan typically addresses goal setting for:

- cash flow
- personal risk management including the adequacy of:
  - ✓ life insurance
  - ✓ disability insurance
  - ✓ medical coverage
  - ✓ auto/home/umbrella liability insurance
  - ✓ long-term care needs
- investment risk tolerance
- college planning
- investment management
- retirement income planning
- basic estate planning

Taxes are an issue in several of these areas and it is a topic that we discuss with you as part of our planning, however, tax planning or accounting are not areas of service we provide.

### ***One-on-One Sessions***

You may engage an associate to create a comprehensive plan or ask for assistance with one or several of the issues listed above. We will send you an agreement that states the nature, scope and fees for the engagement, as well as our Privacy Policy and Form ADV Part 2. After you sign and return the agreement, we will provide you with forms to complete that provide us with the information on your current financial situation that includes your goals, assets, liabilities, insurance policies and monthly spending patterns. This information provides us with a picture of your current situation and we will begin the planning process according to the requirements of the engagement agreement.

All financial planning projects include a written report that assesses your current situation and offer recommendations for changes, when necessary, to assist you in meeting your stated goals. Under this service engagement, you will be responsible for following through on our recommendations. For example, after we deliver the plan it would be your responsibility for obtaining life insurance, opening a college saving plan or making changes to your investment account.

### **Webinar Series**

This service is called “Guided Financial Planning” because you create a personal financial plan through a series of webinars as part of a group. There are five 60-90 minute long webinars with worksheets, homework assignments, and time for questions and answers. The topics that are covered include goal setting; personal risk management, cash flow, retirement planning, college funding, estate planning basics, and investments. These series are offered throughout the year depending on client interest.

### **Ongoing Investment Management Services**

You may also engage our firm to provide Ongoing Investment Management Services. If this service is requested, there are two approaches that we use:

- Custom Investment Management Services – We work one-on-one with you; or
- Semi-Custom Investment Management Services – You invest money into one of six pre-set model portfolios\* along with other investors with similar risk tolerance and time horizon.

\*The model portfolios are managed by Loring Ward Capital Management, Inc.

### **Custom Investment Management Services**

We begin the Custom Investment Management Services engagement by sending you an agreement that states the nature, scope and fees for our services. We will also send you our Privacy Policy and Form ADV Part 2. After you sign and return the agreement, we send information gathering forms that provide us with your current financial situation including goals, risk tolerance, investment philosophy and current holdings which will provide us with a better picture of your situation. We will also need a copy of your most recent investment account statements.

An associate will prepare a customized *Target Portfolio* which will include the type and amount of securities to purchase. The Target Portfolio we develop is based on your stated goals, time horizon and tolerance for risk. We will include all of your investment accounts, such as individual retirement accounts (IRAs); taxable accounts, employer savings plans (i.e., 401(k), 403(b), Employee Stock Purchase Plans), and any non-qualified deferred compensation plans you may have.

Our basic approach is to employ Modern Portfolio Theory that states investment markets are efficient and therefore stock-picking and market-timing are essentially useless and past performance is meaningless. Instead, diversification among different asset classes is the cornerstone of a good portfolio and rebalancing is required to maintain the portfolio mix. [We will go into further detail in Section 5 of this brochure.]

You will implement the necessary all trades with your employer plan or through a custodian that you choose to hold your non-employer plan investment account.

Once the target portfolio is established, you will meet with our associate three or four times a year to review the portfolio’s performance in light of the your goals. If rebalancing is needed to bring the portfolio back into line with the target portfolio, we will recommend how to accomplish this by either adjusting future contributions or through selling some assets and buying others.

In addition to regularly scheduled investment reviews, you may request general personal financial planning advice from our firm. If the requested advice entails extensive effort by an associate, we may charge an additional fee based on the current hourly fee. We may also contact you if investment issues surface that might require adjustments to investment plans or other financial planning issues, for example, a change in interest rates or passage of Federal legislation that might affect you or your account.

### **Semi-Custom Investment Management Services**

You may desire professional management of your investments but would like it to be less effort or time intensive. If you want involvement in the securities market but a simpler approach to investing, we offer Semi-Custom Investment Management Services. This “auto-pilot” approach to investing uses model portfolios to manage your assets.

The portfolios have been created by Loring Ward Capital Management, Inc. (Loring Ward) and use mutual funds from Dimensional Fund Advisors (DFA) as the underlying investment vehicles. Loring Ward acts as the “sub-advisor” to our firm for these models and is an SEC-registered investment adviser headquartered in San Jose, California. Your assets are held in an individual account with a custodian such as Charles Schwab & Co., Inc. (Schwab) or Fidelity Investments, where Loring Ward rebalances the model portfolio regularly to maintain the target allocations.

This type of engagement begins when our firm sends an agreement to you stating the nature, scope and fee for the Semi-Custom Investment Management Service. We will also send you our Privacy Policy and Form ADV Part 2. After you sign and return the agreement, we will request information on your current financial situation, goals, time horizon and risk tolerance. After we have a clear picture of your situation, the rest of the planning process proceeds according to the terms of the agreement. To participate in the semi-custom program, we will require your investment account be transferred to and maintained by Schwab (as custodian) so that they may be allocated within the model portfolios. Therefore, you will be asked to complete various application and asset transfer forms.

We will assist you in selecting the initial model portfolio that meets your risk tolerance and time horizon. There are six portfolios to choose from that range from the most aggressive, with a mix of up to 99% equities and 1% fixed income; to the most conservative, with a mix of approximately 27% equities and 73% fixed income. Your portfolio is rebalanced quarterly. You may stop participation at any time, with no cost to cease participation in the model portfolio.

All of the model portfolios employ Modern Portfolio Theory which focuses on the diversification among different asset classes as its cornerstone and rebalancing where required to maintain the portfolio mix. Each of the model portfolios contain eight more DFA funds that in turn may hold over 7,000 individual stocks.

DFA funds are “structured mutual funds” that follow a passive investing approach. In contrast to a “pure index fund” that follows an external index, like the S&P 500 or Russell 2000, a structured mutual fund creates its own private index that is designed to keep turnover to a minimum. Mutual funds from DFA purchase stocks and bonds that meet its selection criteria based on market capitalization. Once DFA creates the list of stocks that it wants to own in a mutual fund, it buys only those that can be cheaply purchased.

An essential part of the Semi-Custom Investment Management Services is continuous investor education. The purpose of the ongoing education is so that you know what you hold and why. Investor education is accomplished by monthly webinars in which our firm discusses relevant investment issues and offers participants the opportunity to ask questions. Examples of topics that are covered during monthly calls or live events include investment philosophy, history of investing, rebalancing, and the “sky is falling” (not!).

### Important Information

Keep in mind that Juetten Personal Financial Planning, LLC uses its best judgment and good faith effort in rendering its services to its clients but we cannot guarantee any particular level of account performance, or that any account or any individual investment will be profitable over time. With all investments, past performance is not necessarily indicative of future results.

Except as may otherwise be provided by law, the firm will not be liable to the client, heirs, or assigns for any loss an account may suffer by reason of an investment decision made or other action taken or omitted in good faith by the firm with that degree of care, skill, prudence and diligence under the circumstances that a prudent person acting in a fiduciary capacity would use; any loss arising from the firm's adherence to the client or their legal agent's direction; or any act or failure to act by a service provider maintaining an account.

Notwithstanding the preceding, nothing within our client services agreement or this brochure is intended to diminish the firm's fiduciary obligation to act in the client's best interest, or shall in any way limit or waive any rights clients may have under federal or state securities laws or the rules promulgated pursuant to those laws.

### Section 2 - Fees and Compensation

We assess an hourly or project fee for our **Financial Planning Services**. Smaller projects are generally done on an hourly basis, for example, an annual investment review; larger projects are done on a project cost basis, for example, a comprehensive financial plan.

Typically, we charge \$210 per hour for hourly projects and the fee range for projects range from \$1,000 to \$2,000 based on the complexity of your situation. For example, the fee for a single person with one income and two or three investment accounts will be less than the fee a married couple pays who have multiple streams of income, two children, stock options, multiple investment accounts and rental income property. Fees are negotiated between you and our firm based on the scope of services provided. Fees are payable monthly after the selected services have been delivered.

Fees for our **Webinar Series** are \$397 and are paid at the beginning of the first session.

If you request **Custom Ongoing Investment Management Services**, you will pay a quarterly fee that ranges from \$375 to \$1,500. Lower fees may be charged for simpler portfolios; higher fees charged for more complex portfolios and are negotiated between you and our firm based on the scope of services and portfolio complexity. Fees are payable quarterly after services for the period have been delivered.

**Semi-Custom Investment Management Services** has fees from four sources that make up the total cost to you as the investor:

- Mutual fund company (DFA)
- Custodian (Schwab or Fidelity Investments)
- Sub-adviser (Loring Ward)
- Our fee.

Unlike other aspects of our business, these fees are based on a percentage of assets that you invest in a model portfolio. Mutual fund company fees range from .30% to .45% depending on the asset class; Schwab charges a custodian fee of .06% and Fidelity Investments charges a dollar amount for each trade; the sub-adviser charges .65% of assets for its fee. (Depending on the size of your portfolio, the sub-adviser and mutual fund company fees may be blended together and shown as one fee.)

Our fees are set according to this schedule:

<b>Assets Under Management</b>	<b>Our Fee</b>
\$100,000 -- \$499,999	.45%
\$500,000 -- \$999,999	.35%
\$1,000,000 – Above	.25%

For purposes of determining account asset value, securities and other instruments traded on a market where transaction prices are publicly reported are usually valued on the last reported sale price on the principal market in which they are traded. If there are no sales on such date, they will typically be determined by the mean between the *closing bid* and *asked price* on such date. Other readily-marketable securities are normally valued using a pricing service or through quotations from one or more dealers. In the absence of a market value, an independent, third party opinion or good-faith determination by a qualified firm associate may be used.

Our fee is paid quarterly from your account at the beginning of each quarter, for the previous quarter. If you begin or stop participating in a model portfolio during the quarter, our fee is pro-rated. Mutual fund expenses and the custodian fee are deducted from your account before account performance is reported.

There are no other regular fees, however, there may be costs for special features you may set up; for example, the ability to make wire transfers to your bank account may incur a charge from Schwab or Fidelity Investments. A schedule that explains these additional custodian fees can be provided upon request.

You will be required to authorize the custodian to deduct all advisory fees, applicable transaction charges, etc., from your account and all fees will be clearly noted on your statements.

### Account Fees

At our discretion, we may aggregate investment management accounts (including multiple accounts) for the same client, or two or more accounts within the same family, or accounts where a family member has power of attorney over another family member or incompetent person's account. If investment objectives are substantially different for any two or more household accounts requiring different investment approaches, we reserve the right to apply our fee schedule separately to each account.

Any discounting of fees is negotiable and at the discretion of a firm principal and we may also waive fees in certain circumstances.

We ask that you regularly review your statements to verify the accuracy of fee calculations and to contact us if you have questions.

### Termination of Services

Once you enter into an agreement with Juetten Personal Financial Planning, LLC, either you or we may terminate the agreement thereafter at any time.

Termination will typically be in writing. If, however, you verbally notify our firm of termination and we do not receive a written termination notice from you within three business days, we will have documented your verbal instructions to terminate the relationship in our records and will send you a written termination notice at the address noted in your agreement.

You may terminate an engagement with our firm without penalty or charge within five business days after signing the agreement.

If you have engaged our firm for semi-custom investment services, following termination notice it will be your responsibility to ensure an immediate transfer is completed of any portfolio, account, or residuals to the next service provider you choose. In all instances, we will not be responsible for future allocations, transactional services or investment advice upon receipt of a termination notice.

### **Section 3 - Performance-Based Fees and Side-By-Side Management**

Our fees will not be based upon a share of capital gains or capital appreciation (growth) of any portion of managed funds, also known as "performance-based fees." Juetten Personal Financial Planning, LLC does not use a performance-based fee structure because of the potential conflict of interest this type of fee structure may pose. Performance-based compensation may create an incentive for a firm to recommend an investment that may carry a higher degree of risk to a client.

Side-by-side management refers to a firm simultaneously managing accounts that do pay performance based fees (such as a hedge fund) and those that do not; this type of arrangement, and the conflict of interest it may pose, is also not applicable to our firm's practices.

### **Section 4 - Types of Clients**

Juetten Personal Financial Planning, LLC provides services to help individual investors, trusts, estates, and charitable organizations address their financial objectives in what is believed to be a cost-effective way.

Our ability to provide the best service and advice depends on access to information. Accordingly, our clients are expected to provide us with an adequate level of information and supporting documentation throughout the term of the engagement, including but not limited to: source of funds; income levels, the client's (or their legal agent's) authority to act on behalf of the account, among other information. This helps us determine the appropriateness of our financial planning or investment strategy for the client or account.

It is very important that you keep us up-to-date on significant changes that may call for an update to your financial and investment plans. Events such as job changes, retirement, a marriage or divorce, or the purchase or sale of a home can have a tremendous impact on your circumstances and needs.

If we are aware of such events, we can make the adjustments needed to your plan or advice in order to keep you on track toward your goals.

We do not require minimum income levels, minimum level of assets, or other conditions for our financial planning and investment consultation services. Our fixed fees may be impractical for smaller accounts, therefore, an hourly assessment may be employed. Loring Ward may also choose to restrict model portfolio accounts with less than \$100,000 in investible assets.

We reserve the right to waive or reduce certain fees based on unique individual circumstances, special arrangements, pre-existing relationships or as otherwise may be determined by a firm principal. We also reserve the right to decline services to any prospective client for any reason.

## **Section 5 - Method of Analysis, Investment Strategies and Risk of Loss**

### **Method of Analysis**

If we are engaged to provide services, we will first evaluate several factors, including:

- your current financial situation,
- your current and long-term needs,
- your investment goals and objectives, and
- your tolerance for risk.

We make asset allocation and investment policy decisions based on these and other factors. We will then discuss with you how, in our best judgment, to meet your objectives while at the same time seeking a prudent level of risk exposure.

To achieve this, we typically employ fundamental analyses to develop long-term investment strategies. For example, fundamental analysis of a bond's value could involve evaluating economic factors including interest rates, the current state of the economy, and information about the bond issuer's credit ratings. Fundamental analysis of a stock takes into account revenues, earnings, future growth, return on equity, profit margins and other data to evaluate a company's value and its potential for future growth.

Our research and recommendations may be drawn from sources that include financial publications; investment analysis and reporting software; research materials from outside sources; corporate rating services; annual reports, prospectuses and other regulatory filings; and company press releases.

## Investment Strategies

Our investment strategy is based on four principles: investment markets are efficient; diversification is the key to managing risks, costs matter and regularly rebalancing a portfolio is essential. As such, we recommend that our clients follow an asset allocation approach to investing and focus on finding the right mix of asset classes for their goals, time horizon, risk tolerance and unique interests.

We recommend clients use index funds or exchange-traded funds (ETFs) whenever possible and, when an index fund or ETF is not available for an asset class that our client wants to hold in their portfolio, we will recommend low-cost mutual funds.

For example, you may hold a portion of your investments in a company-sponsored savings plan like a 401(k) or 403(b) plan that does not offer index funds. In this case, we may recommend low-cost mutual funds from the limited universe of funds. We also recommend that our clients rebalance their portfolio at a minimum of once per year for taxable accounts; twice a year for tax-deferred or tax-free accounts.

If you have an existing portfolio at the time you engage our firm, we will evaluate your existing holdings and determine whether it is appropriate to continue to hold some or all of them, based on your objectives and needs.

For custom portfolios, we employ a “Core and Satellite” approach to create the overall portfolio. In using this approach, the core is made up of 80% to 95% index funds or ETFs representing the major asset classes. The satellite portion is made up of securities you believe will outperform the overall investment markets. For example, if you believe a particular stock or market sector is under-valued and is likely to increase in value at a greater rate compared to the overall investment markets, that stock or market sector (fund or ETF) will be in the satellite portfolio. *We do not evaluate or recommend any securities that you may hold in the satellite portion of your overall portfolio.*

Models managed by Loring Ward through our semi-custom investment services are constructed using Modern Portfolio Theory and the Efficient Market Philosophy to create and manage portfolios that fall on the “efficient frontier.” Loring Ward does not make asset allocation decisions based on the conditions of the economy or the market, but rather on economic research related to the manner in which various asset classes have performed and the correlation of their performance over time.

Loring Ward’s investment strategy involves asset allocation with periodic rebalancing and/or re-optimization of portfolios and target allocations as needed. Your account is invested in accordance with your asset allocation strategy. At the inception of your account, assets are invested in specific asset class mutual funds and cash-like investments (i.e., money markets, etc.). Amounts invested in each asset type are determined by set target percentages of total assets in the account. As markets fluctuate and values change, amounts originally allocated to an asset type will either exceed or fall below the original target allocation. Loring Ward will periodically adjust your account holdings back to the original asset targets or rebalance the account.

You should note that Loring Ward does not rebalance accounts constantly and asset allocations may drift away from their original target percentages before Loring Ward bring allocations back in line to the original percentages. When your account is rebalanced, they may sell holdings that are appreciating in value to buy other holdings that may be declining in value. However, the investment philosophy of an asset allocation strategy is to be positioned in various asset types so that when the asset type becomes profitable, the account is positioned to take advantage of the upturn.

You will be granting Loring Ward the authority to reallocate assets in your account. During a reallocation, they will change the target percentages that some or all of the asset classes or types will have relative to the total account, and reallocations occur with less frequency than rebalancing.

### Risk of Loss

While we believe our strategies and investment recommendation are designed to potentially produce the highest possible return for a given level of risk, we cannot guarantee that an investment objective or planning goal will be achieved.

Some investment decisions may result in loss, including potential loss of the original principal invested. Each client must be able to bear the various risks involved in the investment of account assets, which may include market, currency, interest rate, liquidity, operational or political risk, among others.

When our research and analysis is based upon commercially available software, rating services, general market and financial information, or due diligence reviews, we are relying upon the accuracy and validity of the information or capabilities being provided by selected vendors, rating services, market data, and the issuers themselves. We make a reasonable effort to determine the accuracy of the information received but we cannot predict events, actions taken or not taken, or the validity of all information researched or provided which may or may not affect the advice to a client or account.

Strategies involving Core and Satellite investing may have the potential to be affected by “active risk” or “tracking error risk,” which might be defined as a deviation from the stated benchmark. Since the core portfolio attempts to closely replicate a stated benchmark, the source of the tracking error or deviation may come from a satellite portfolio or position, or from a “sample” or “optimized” index ETF that may not as closely align the stated benchmark. In these instances, we may recommend reducing the weighting of a satellite holding; utilize very active satellites, or use a “replicate index” ETF as part of a core holding to minimize the effects of the tracking error in relation to the overall portfolio.

When employing an efficient markets strategy (i.e., Modern Portfolio Theory), you will want to consider the potential risk that the broader allocation may generate lower-than-expected returns than that from a specific asset, and that the return on each type of asset is a deviation from the average return of the asset class. We believe this variance from the “expected return” is generally low under normal market conditions if the portfolio is made up of diverse, non-correlated assets.

Further, while many ETFs or similar holdings are known for their potential tax-efficiency and higher “qualified dividend income” (QDI) percentages, there are certain asset classes or holding periods that may not benefit. Shorter holding periods as well as certain commodities and currencies may be considered “non-qualified” under certain tax code provisions; therefore, the holding’s QDI will be considered if tax-efficiency is an important aspect of the portfolio.

### **Section 6 - Disciplinary Information**

Neither Juetten Personal Financial Planning, LLC nor any of our associates have been the subject of a reportable legal or disciplinary event pursuant the Investment Advisers Act of 1940 (as amended) or similar state statute.

## **Section 7 - Other Financial Industry Activities and Affiliations**

Our policies require our firm and associates to conduct business activities in a manner that avoid actual or potential conflicts of interest between our firm, employees and clients, or that may be contrary to law. We will provide disclosure to each client prior to and throughout the term of an engagement regarding any conflicts of interest which might reasonably compromise our impartiality or independence.

Neither our firm nor an associate is affiliated with or maintain a material relationship or arrangement with another financial services industry entity, such as a broker/dealer.

Juetten Personal Financial Planning, LLC is a member of the Garrett Planning Network (Garrett), an organization that assists financial planners in fee-only financial planning practices. Garrett is not a registered financial industry participant nor is it believed its activities require it to be. We pay an annual membership fee to Garrett for extensive services that include training, compliance and operational support to enhance our ability to provide quality service and advice to our clients.

Our associates may hold individual memberships or serve on boards or committees of professional industry associations or organizations such as the Financial Planning Association (FPA) or the Certified Financial Planner Board of Standards, Inc. Generally, participation in these entities requires membership fees to be paid, adherence to ethical guidelines, and meeting experiential and educational requirements.

## **Section 8 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

### **Code of Ethics**

We have adopted a Code of Ethics that establishes policies of ethical conduct for all our personnel. Our firm accepts the obligation not only to comply with all applicable laws and regulations but also to act in an ethical and professionally responsible manner in all professional services and activities. Our policies include prohibitions against insider trading, circulation of industry rumor, certain political contributions, among others.

Associates who are CFP® designees or FPA members also adhere to the Certified Financial Planner Board of Standards Code of Ethics. These principles include:

#### *Principle 1 – Integrity*

An adviser will provide professional services with integrity. Integrity demands honesty and candor which must not be subordinated to personal gain and advantage. Advisers are placed by clients in positions of trust and the ultimate source of that trust is the adviser's personal integrity. Allowance can be made for innocent error and legitimate differences of opinion but integrity cannot co-exist with deceit or subordination of one's principles.

### *Principle 2 – Objectivity*

An adviser will provide professional services objectively. Objectivity requires intellectual honesty and impartiality. Regardless of the particular service rendered or the capacity in which an adviser functions, an adviser should protect the integrity of their work, maintain objectivity and avoid subordination of their judgment.

### *Principle 3 – Competence*

Advisers will maintain the necessary knowledge and skill to provide professional services competently.

Competence means attaining and maintaining an adequate level of knowledge and skill, and applies that knowledge effectively in providing services to clients. Competence also includes the wisdom to recognize the limitations of that knowledge and when consultation with other professionals is appropriate or referral to other professionals necessary. Advisers make a continuing commitment to learning and professional improvement.

### *Principle 4 – Fairness*

Advisers will be fair and reasonable in all professional relationships. Fairness requires impartiality, intellectual honesty and disclosure of material conflict(s) of interest. It involves a subordination of one's own feelings, prejudices and desires so as to achieve a proper balance of conflicting interests. Fairness is treating others in the same fashion that you would want to be treated and is an essential trait of any professional.

### *Principle 5 – Confidentiality*

Advisers will protect the confidentiality of all client information. Confidentiality means ensuring that information is accessible only to those authorized to have access. A relationship of trust and confidence with the client can only be built upon the understanding that the client's information will remain confidential.

### *Principle 6 – Professionalism*

Advisers will act in a manner that demonstrates exemplary professional conduct. Professionalism requires behaving with dignity and courtesy to all who use their services, fellow professionals, and those in related professions. Advisers cooperate with fellow advisers to enhance and maintain the profession's public image and improve the quality of services.

### *Principle 7 – Diligence*

Advisers will provide professional services diligently. Diligence is the provision of services in a reasonably prompt and thorough manner, including the proper planning for, and supervision of, the rendering of professional services.

We periodically review and amend our Code of Ethics to ensure that it remains current, and we require all firm access persons to attest to their understanding of and adherence to the Code of Ethics at least annually.

Our firm will provide of copy of its Code of Ethics to any client or prospective client upon request.

#### Privacy Policy

A copy of our privacy policy notice is provided prior to or along with the execution of an engagement agreement. We will notify you annually of our privacy policy and at any time, in advance, if it is expected to change.

To ensure security and confidentiality, we maintain physical, electronic, and procedural safeguards to protect the privacy of your information.

Identifiable information about you and your account will be maintained during the span of the engagement and for the period thereafter as required by both securities industry and state privacy laws. After that time, information will be destroyed under our records destruction guidelines.

#### Participation or Interest in Client Transactions

Neither Juetten Personal Financial Planning, LLC nor any related person is authorized to recommend to a client, or effect a transaction for a client, involving any security in which our firm or a related person has a material financial interest, such as in the capacity as an underwriter, adviser to the issuer, etc.

Our employees are prohibited from borrowing from or lending to a client unless the client is an approved financial institution.

We recognize that should we act as the adviser to the sponsor of an ERISA-qualified retirement plan (i.e., 401(k) or pension plan) and one of our associates serves in an advisory capacity to one or more of the plan's participants, a potential or implied conflict of interest may occur. We may require our associate to cease in this plan participant advisory capacity or, upon disclosure to and approval from the plan sponsor, allow the dual advisory role to continue with consideration being made to offset participant fees where appropriate.

Our firm provides a range of services to our clients, which include financial planning, investment consultation and investment management, where it will be paid a fee. Due to our firm's ability to offer all of these services to a client, a potential conflict of interest may exist. Therefore, a client is under no obligation to act upon our recommendations and, if the client elects to act on any of our recommendations, they are under no obligation to affect each of these through Juetten Personal Financial Planning, LLC or its associates.

#### Personal Trading

Juetten Personal Financial Planning, LLC and its related persons may buy or sell securities similar to, or different from, those we recommend to clients for their accounts. A recommendation made to one client may be different in nature or in timing from a recommendation made to a different client. At no time will our firm or any related party receive preferential treatment over its clients.

In an effort to reduce or eliminate certain conflicts of interest involving personal trading, our policy may require that we restrict or prohibit associates' transactions in specific reportable securities transactions. Any exceptions or trading pre-clearance must be approved by the firm principal in advance of the transaction in an account. We maintain the required personal securities transaction records per regulation.

### **Section 9 - Brokerage Practices**

Juetten Personal Financial Planning, LLC is not affiliated with a "service provider" such as a bank, custodian, or broker/dealer firm. When engaged to provide investment consultation services, we may recommend the service provider with whom your assets are currently maintained. Should you prefer a new service provider, our recommendation of another service provider will be based on your needs, overall cost, and ease of use.

If you engage our firm for its Semi-Custom Investment Management Services, your account must be maintained by Schwab or Fidelity Investments. We believe the selection of Schwab and Fidelity Investments as the primary custodians for client model portfolios is due to what we would describe as the industry's "best practices;" combining the elements of low (not necessarily the lowest) transaction costs for the benefit of custody of client's securities, and services to both the client and our firm in an effort to better support your account. Such services involve, for example, handling distributions or withdrawals, account billing, electronic statements, etc. Research is also a modest consideration.

It is our policy to restrict non-cash compensation from any service provider (sometimes termed "soft dollars" in certain jurisdictions) to those products or services that enhance our ability to render quality advice and service equally to all of our clients that utilize any services provided by Schwab or Fidelity Investments. Although we may maintain our model portfolios with Schwab or Fidelity Investments, we derive no special benefit (any more than any other investment advisory firm) from doing so, nor do we "pay up" to receive any additional services.

Industry fees and schedules periodically change; subsequently, transaction fees charged by Schwab or Fidelity Investments may be higher or lower than those charged by other entities. We believe their rates are reasonable in relation to the value of the services received. Fees paid by our clients will also comply with our duty to obtain "best execution" (as further defined in a following paragraph).

We conduct periodic assessments of Schwab and Fidelity Investments, their range of services and capabilities, as well as the reasonableness of their fees, in comparison to their industry peers.

### **Client Referrals**

All compensation paid to Juetten Personal Financial Planning, LLC is paid directly by our clients. We do not receive any additional monetary compensation when a client engages a recommended service provider.

### **Directed Brokerage**

We do not require or engage in directed brokerage involving our client accounts. We recognize our obligation in seeking "best execution" for model portfolio clients, however, we believe the determinative factor is not always the lowest possible cost but whether a selected service provider's transactions represent the best "qualitative" execution while taking into consideration the full range of

services provided. Therefore, we seek services involving competitive rates but they may not necessarily correlate into the lowest possible rate for each transaction. We periodically review our policies regarding recommending any service provider (including Schwab and Fidelity Investments) to our clients in light of our duty to seek "best execution" as well as our general due diligence obligations.

You may direct our firm (in writing) to use another broker/dealer to execute some or all of your transactions. In these circumstances, you will be responsible for negotiating, *in advance*, the terms or arrangements for your account with the selected broker/dealer or custodian. We will not be obligated to seek better services or prices through these other service providers. As a result, you may or may not pay higher commissions or other transaction costs, experience greater spreads, or receive less favorable net prices, on transactions for your account than would otherwise be the case.

### Trade Aggregation

Due to the nature of our services and client engagements, we do not aggregate client trades.

Trade aggregation, "block" or "batched" orders often refer to a firm purchasing or selling the same securities for several clients at approximately the same time. This is done in an attempt to obtain better execution, negotiate more favorable transaction rates, or allow a firm to allocate equitably among client accounts should there be differences in prices and commissions or other transaction costs that might not have been obtained had orders been separately placed.

Loring Ward will aggregate trades within the model portfolios. It is their policy that when a decision is made to aggregate transactions on behalf of more than one account, the transactions will be allocated to all participating client accounts in a fair and equitable manner. Further information about their aggregation and allocation policies may be found in their current Form ADV Part 2.

### Section 10 - Review of Accounts

The timing of an investment review depends on the engagement agreement, which describes the nature of services you receive from our firm.

If your agreement is for one-time project, then a review occurs when you request it. A one-time review is done at the asset-class level (i.e., U.S. stocks, non-U.S. stocks, bonds, etc.) and at the "tactical level" (i.e., specific funds or ETFs).

For a custom portfolio through our ongoing investment management engagement, reviews typically occur three or more times a year according to your preference and as stated in the agreement. We review custom portfolios with you at the asset-class and tactical level. You also receive quarterly reports from our firm for your account that will show your overall asset allocation, portfolio and individual security rates of return, portfolio expenses and historical returns for the portfolio and individual holdings. We generally use Morningstar® software to create these reports and we will prepare a commentary with a recommendation for portfolio adjustments, if warranted.

If you engage our firm for semi-custom investment services where your assets are invested in one of the model portfolios, reviews are offered to you quarterly and typically at the portfolio level, not at the underlying mutual fund level.

Loring Ward prepares a quarterly report on the client's portfolio that will show individual holdings, historical performance information, transactions (if any) and overall asset allocation information.

### **Section 11 - Client Referrals and Other Compensation**

We may provide a one-time referral fee of no greater than 15% to Retirement Planning Associates of Kirkland, Washington for any clients referred to us by their firm.

As stated earlier, Juetten Personal Financial Planning, LLC and its associates may be members of the Garrett Planning Network, FPA and other professional associations. A benefit these entities may provide to the investing public is the availability of online search tools that allow interested parties (prospective clients) to search for participant firms or individual financial planners within a selected state or region. These passive websites may provide means for interested persons to contact a firm or planner via electronic mail, telephone number, or other contact information, in order to interview the participating firm or planner. Members of the public may also choose to telephone association staff to inquire about a firm or individual planner within their area, and would receive the same or similar information.

Prospective clients locating our firm or an associate via this method are not actively marketed by the association. Clients who find us in this way do not pay more for their services than clients referred to us in another fashion, such as by another client. We do not pay these entities for prospective client referrals, nor is there a fee-sharing arrangement reflective of a solicitor engagement.<sup>1</sup>

We may provide referrals to various other professionals, such as an attorney or accountant, as a service to our clients. We do not have an agreement with or receive referral fees from these professionals for these informal referrals. Any fees charged by these entities are completely separate from fees charged by Juetten Personal Financial Planning, LLC.

### **Section 12 - Custody**

All client funds and securities will be maintained by an unaffiliated, qualified custodian such as a bank, broker/dealer, mutual fund company, or transfer agent, and not with or by Juetten Personal Financial Planning, LLC or any of our associates.

In keeping with our policy of not having custody of client funds or securities, we:

- Restrict Juetten Personal Financial Planning, LLC and our associates from acting as trustee for or having full power of attorney over a client account.
- Do not accept or forward client securities (i.e., stock certificates) erroneously delivered to our firm.
- Will not collect fees for services to be performed more than six months in advance.

---

<sup>1</sup>The firm believes this arrangement is in consonance with SEC No-Action Letter No. 1251421 in its response to the National Football League Players Association.

- Are prohibited from having authority to withdraw securities or money from a client account, other than for payment of our advisory fees that is accomplished through a qualified custodian of your assets and pursuant a written agreement.
- Will not authorize any associate to have knowledge of a client's account access information (i.e., online 401(k), brokerage or bank accounts), even for the convenience or accommodation of the client or the client's legal agent.

You will be provided with transaction confirmations and summary account statements provided directly to you by your selected service provider. Typically, these statements are provided on a monthly or quarterly basis, or as transactions occur. We will not create a statement for you nor be the sole recipient of your statements.

As noted earlier, you may receive periodic reports or "snapshots" from our firm and Loring Ward that will include investment performance information. You are urged to compare your account statements that you have received directly from your service provider with any report you receive from Juetten Personal Financial Planning, LLC or Loring Ward.

### **Section 13 - Investment Discretion**

Except for the semi-custom investment management services, we do not execute transactions for our clients' accounts. Under unique circumstances, if we were asked to do so – perhaps under the custom investment management agreement – we would only do this for our clients under a non-discretionary engagement agreement. This means we would not implement an investment decision on behalf of your account, such as the purchase or sale of a security, without your first granting our firm the authority to do so. By definition and absent your written instruction to the contrary, a non-discretionary account transaction does not involve those with respect to a trade execution's price or time.

Model portfolio accounts maintained by Loring Ward under the semi-custom investment management services agreement are under a discretionary account agreement. Similar to a limited power of attorney, this authority allows Loring Ward to implement investment decisions on behalf of your account without your prior authorization in order to meet your account's investment objectives within the selected model portfolio.

If you have account restrictions, limitations, and rescissions, they must be made in writing to our firm and they will be approved (in writing) by a firm principal. We will maintain a record of these requirements and they will be retained per current regulation.

### **Section 14 - Voting Client Securities**

#### **Proxy Voting**

Our firm does not vote proxies on your behalf. You will maintain exclusive responsibility for directing the manner in which proxies solicited by issuers of securities that are beneficially owned by you shall be voted, as well as making all other elections relative to mergers, acquisitions, tender offers or other events pertaining to your holdings.

Accounts managed under the semi-custom investment management services agreement may have proxy voting executed by Loring Ward. It is important for you to review Loring Ward's ADV Part 2 to determine their proxy voting policies. You may also obtain copies of their written proxy voting policies and procedures as well as information on how proxies were voted for an account by requesting such information directly from Loring Ward. They will not disclose proxy votes to other clients or third parties unless specifically requested, in writing, by you or your legal representative.

#### Firm's Receipt of Materials

If our firm receives correspondence relating to the voting of your securities, class action litigation, or other corporate actions, we typically forward the correspondence to your address of record, or to another entity such as your attorney if you direct us to do so.

#### **Section 15 - Financial Information**

Due to the nature of our services an audited balance sheet is not required nor included in this disclosure. No further material financial information is required to be provided.

#### **Section 16 – Advisory Personnel (Part 2B)**

##### Managing Member/Majority Shareholder/Firm Principal/Investment Adviser Representative

Stephen M. Juetten, CFP®

##### Educational Background and Business Experience

###### ***Education***

Certified Financial Planning Practitioner (CFP®)<sup>1</sup>

Uniform Investment Adviser Law Examination (Series 65)

BA English, St. Johns University; Collegeville, Minnesota

MA English, University of Minnesota-Duluth; Duluth, Minnesota

###### ***Business Experience***

Principal, Juetten Personal Financial Planning, LLC [2002-Present]

Corporate Secretary/Treasurer, Nancy S. Juetten Marketing, Inc. [2004-Present]

Adjunct Professor, City University [2004-2008]

Senior Employee Communications Consultant, Milliman USA [2001-2004]

Consultant, Aon Consulting [1999-2001]

##### Disciplinary Information

Mr. Juetten has not been the subject of any disciplinary action.

### Other Business Activities

Mr. Juetten is a 20% owner in Nancy S. Juetten Marketing, Inc., a marketing and public relations consulting, education and training firm led by his spouse. He also serves as the Corporate Secretary and Treasurer for the firm and spends 10% or less of his time fulfilling these duties.

Occasionally, Mr. Juetten writes books and special reports for sale to interested members of the public.

### Additional Compensation

Juetten Personal Financial Planning, LLC employees do not accept or receive additional economic benefit (i.e., sales awards or other prizes) for providing advisory services to firm clients.

### Supervision

Mr. Juetten serves in multiple capacities with the firm: Managing Member, Firm Principal, Financial Planner, and Investment Adviser Representative, and he is responsible for the supervision of the firm's advisory services activities and any of its staff.

The firm recognizes that not having all organizational duties segregated may potentially create a conflict of interest. To address any such potential conflicts, Juetten Personal Financial Planning, LLC employs policies and procedures to ensure timely, accurate record keeping and supervision. The firm may outsource certain functions to qualified entities to assist in these efforts when deemed necessary.

Questions relative to the firm, staff, its services, or this ADV Part 2 or its Advisory Personnel Supplemental Brochure may be made to the attention of Mr. Juetten at (425) 373-9393.

Additional information about the firm, other advisory firms, or an associated representative is available at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). A search for firms or associated personnel can be accomplished by name or firm identifier, known as an IARD number. The IARD number for Juetten Personal Financial Planning, LLC is 118564.

The business and disciplinary history of an investment advisory firm and its representatives may also be obtained by calling the Department of Financial Institutions' Securities Division at (360) 902-8760.

<sup>1</sup>The **CERTIFIED FINANCIAL PLANNER™**, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.