

## WWA Planning & Investments

427 Washington Street

Columbus, Indiana 47201

Phone: 812-379-1120

Fax: 866-874-9988

Web Site: [www.wwafp.com](http://www.wwafp.com); [www.warrenwardassociates.com](http://www.warrenwardassociates.com)

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This brochure provides information about the qualifications and business practices of WWA Planning & Investments. If you have any questions about the contents of this brochure, please contact us at 812-379-1120. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about WWA Planning & Investments is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The searchable IARD/CRD number for WWA Planning & Investments is 281159.

WWA Planning & Investments is a Registered Investment Adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

## **Item 2 – Material Changes**

The purpose of this page is to inform you of any material changes since the last annual update to this brochure. If you are receiving this brochure for the first time, this section may not be relevant to you.

We have made no material changes since our most recent annual update, dated January 1, 2020.

We will provide you with a new brochure as necessary based on changes or new information, at any time, without charge.

Our brochure may be requested by contacting Jalene Hahn, Chief Compliance Officer, at (812) 379-1120 and/or [jalene@wwafp.com](mailto:jalene@wwafp.com).

Additional information about WWA Planning & Investments is also available via the SEC's website, [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC's website also provides information about any persons affiliated with WWA Planning & Investments who are registered, or are required to be registered, as investment adviser representatives of WWA Planning & Investments.

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## **Item 4 – Advisory Business**

Wisdom Wealth Abundance, LLC, dba WWA Planning & Investments, was granted registration by the State of Indiana in 2015. Jalene Thompson Hahn (CRD Number 4914113) is the owner of the firm. Ms. Hahn owns one hundred (100%) percent of the equity of the firm. There are no indirect owners of the firm or intermediaries which have any ownership interest in the firm. As of December 31, 2020, the firm managed, on a discretionary basis, \$55,726,815.

The firm manages client assets on an individualized basis.

### **Company Overview**

WWA Planning & Investments (WWA) is an Indiana State registered investment adviser offering financial planning, consulting and investment management services. Our investment management services, as described elsewhere herein, are part of the implementation process that occurs as an outcome of the financial planning process. Use of our investment management services is not required of those who wish to use the personal financial planning services. However, we believe clients who use both are best served.

### **Engagement Options**

As a fee-only advisory service there are never any commissions received from a client's purchase or sale of products or services, nor are any client referral fees paid or received. The only income from financial advising is from planning or retainer fees received from our clients. Disclosure information is arranged by service type:

- Financial Planning and Advice
- Young Professional – Asset Accumulation Program
- On-Going Financial Planning and Investment Management Services

### **Financial Planning and Advice**

WWA offers comprehensive personal financial planning services as well as limited engagement projects for a fee. Key elements of a comprehensive financial plan include risk management (insurance), budgeting, debt management, saving, retirement planning, tax strategies, estate planning and investments. Other services focus on guiding clients through life transitions of widowhood, divorce, getting started and planning for college.

Depending on the scope of the assignment and the complexity of the planning to be performed or advice to be given engagements can take from approximately 6 – 8 weeks with occasional plans lasting 6 months.

Engagements follow the same process but are differentiated by the scope and depth of the areas addressed, depth of the analysis, development of recommendations, creation of deliverables, and presentation. Clients continue to have access to their on-line dashboard for 6 months following the conclusion of the engagement.

Financial planning and advice are a service separate from our investment management services. Clients have full discretion as to the extent to which, if at all, they choose to implement the recommendations discussed in the engagement.

Stand-alone engagements do not include recommendations on specific individual investments, preparation of any kind of income tax, gift or estate tax returns, preparation of any legal documents, including wills or trusts. Specific investment recommendations are considered part of the implementation phase of the relationship and are only available through an on-going relationship. The others constitute legal or tax advice, which are not provided by WWA.

### **Retirement Readiness Appraisal - \$600**

Think you're ready to retire, but want to make sure? Designed for anyone close to retirement, this is a **one-time two-hour consultation**.

### **In-Depth Financial Planning - \$600 - \$5,600**

This type of planning is offered in complex situations requiring in-depth analysis in several areas.

### **Young Professional Asset Accumulation Program**

This level is for clients who are new to financial planning and/or investing, want an on-going relationship with a financial advisor and are committed to making regular investment contributions. Investment options are limited but offer access to low-cost standardized model portfolios of either ETF's or Dimensional Fund Advisor Mutual Funds. There is no coordination with outside investment accounts. Fees are based on Gross Annual Household Income.

	Monthly	Annual
Income up to \$149,999	\$125	\$1,500
Income between \$150,000 - \$249,999	\$165	\$1,980
Income over \$250,000	\$215	\$2,580

There is a one-time initial set up fee of \$200. At the end of the one-year program, Clients may terminate our relationship or migrate to an On-going Financial Planning and Investment Management Service.

### **On-Going Financial Planning and Investment Management Services**

Clients may prefer an on-going relationship for assistance in financial planning and implementation. In addition to on-going investment management, this service offers regular plan updates, check-ins and includes a proactive aging component.

Implementation of the plan or investment management of client portfolios follows a process of asset allocation. Investments are selected for client accounts based on numerous factors including asset class, consistency of returns, correlation with other asset classes, expenses, taxes and availability through the custodian(s) to be utilized.

For clients with investable assets of over \$600,000 our fees are determined by percentage of assets under management, number of accounts and complexity.

The flat annual fee is reset each year and is roughly based on year end market values (using the table below), number of accounts, etc. and is effective April 1<sup>st</sup>. Fees will be reviewed with clients in the first quarter and the new fee is effective with the 2<sup>nd</sup> quarter billing. The annual fee is payable in quarterly installments based on the billing cycle month the client begins. Billing starts on an agreed upon month and allows time for assets to be deposited or transferred. For example, for an agreement signed in March the assets may not be transferred to the new account until middle of April. Billing would start in May. Fees are not adjusted in the middle of the year if client transfers out or adds assets, those will be included in the year end calculation.

Asset Range	Annual %	Annual Minimum	Annual Maximum
Assets between \$600,000 - \$849,999	1.00%	\$6,000	\$8,500
Assets from \$850,000 to above \$5,400,000	0.75%	\$6,400	\$40,000

**For households with less than \$600,000 in Investable Assets:**

Though we do not require a minimum asset level as a prerequisite for working with a client, we do ask that clients with smaller asset bases pay a minimum fee. These minimums differ with the age of the client, as follows:

Age	Minimum Annual Fee
20 – 30 years	\$2,400
30 – 40 years	\$3,600
40 – 50 years	\$5,400
50 – 60 years	\$6,000
60 years+	\$8,400

Clients pay the greater of their age-based minimum and their asset-based calculated fee. We may negotiate different fee arrangements for clients in unusual circumstances.

**Retirement Rollovers-No Obligation/Conflict of Interest:**

A client leaving an employer typically has four options (and may engage in a combination of these options):

- 1) leave the money in his former employer’s plan, if permitted,
- 2) roll over the assets to his/her new employer’s plan, if one is available and rollovers are permitted,
- 3) rollover to an Individual Retirement Account (IRA), or

- 4) cash out the account value (which could, depending upon the client's age, result in adverse tax consequences).

WWA may recommend an investor roll over plan assets to an IRA managed by WWA. As a result, WWA may earn an asset-based fee; however, a recommendation that a client or prospective client leave their plan assets with their old employer will result in no compensation. WWA has an economic incentive to encourage an investor to roll plan assets into an IRA that WWA will manage.

There are various factors that WWA may consider before recommending a rollover, including but not limited to: i) the investment options available in the plan versus the investment options available in an IRA, ii) fees and expenses in the plan versus the fees and expenses in an IRA, iii) the services and responsiveness of the plan's investment professionals versus those of WWA, iv) required minimum distributions and age considerations, and vi) employer stock tax consequences, if any. No client is under any obligation to roll over plan assets to an IRA managed by WWA.

The specific services and compensation arrangement appropriate to each client, as well as appropriate disclosures, are documented in the Agreement signed by the client prior to service being rendered. A client's Agreement will reflect the fee schedule in effect at the time it was executed and may differ from the current fee schedules described above; it may also differ from the fee arrangements in force for other clients. Fees and/or minimums may be negotiable where special circumstances exist.

### **Item 5 – Fees and Compensation**

Fees are discussed in Item 4 above.

WWA strives to provide the most cost-effective investment strategy for our investment management clients. All fees paid to WWA for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. A client could invest in most mutual funds directly, without the services of WWA. In that case, the client would not receive the services provided by WWA which are designed, among other things, to assist the client in determining which investments are most appropriate to each client's financial objectives.

Accordingly, the client should review both the fees charged by the funds and the fees charged by WWA to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided. WWA or the Client may terminate this Agreement at any time on ten business days' prior notice. Notice of termination must be given in writing and delivered to the appropriate party's last known address. Advisor acknowledges Client's right to initiate an ACAT transfer and account closure without prior notification. In this instance, Client agrees to forfeit fees pre-paid to the Advisor. For accounts transferred or closed with appropriate notice, refunds will be made within 15 days of account transfer or closure and be pro-rated on a monthly basis.

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

Item 6 is not applicable to WWA. WWA does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client). Such acceptance or management would pose a significant conflict of interest to clients because performance-based fees may provide an incentive to favor such accounts over the accounts of clients under our other advisory programs. WWA considers avoidance of such conflict a paramount policy to maintain a fiduciary duty to the client.

## **Item 7 – Types of Clients**

### **Types of Clients**

WWA offers services to clients that are individuals, pension plans, profit sharing plans, trusts, estates, charitable organizations, corporations and other business entities.

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

**General Beliefs:** WWA manages investment portfolios with a belief that asset allocation, diversification, security selection and portfolio rebalancing are the primary drivers in investment success.

The investment advice which WWA provides is based upon long-term investment strategies which incorporate the principles of Modern Portfolio Theory. The utilization of several different asset classes as part of an investor's portfolio is emphasized, as this has been shown to usually effect a reduction in portfolio volatility over long periods of time. We believe that markets are normally fairly efficient, although not always rationale, and that portfolio returns are principally determined by asset allocation decisions, and are assisted by maintaining a focus on low internal cost structure of investments used.

Clients of the firm receive the services of our developed investment philosophies and strategies, research and due diligence, account monitoring and trading. After discussions with each client, they receive an agreed upon asset allocation model which serves as a target when portfolio reviews take place. This may or may not include an amount of "carved off cash" which represent dollars that are segregated from the rebalancing process.

To help develop its strategies and recommendations, WWA uses commercially available services such as financial publications and information services dealing with investment research and taxation. Such information may be accessible in print, on computer media, via the internet, or via some other electronic means. Company prepared materials (particularly prospectuses) and research releases prepared by others are also utilized. As an investment advisor, WWA has the frequent opportunity to access information from a variety of experts, whether through personal visits, telephone calls, or at industry or related meetings. Independent, third party registered investment advisors may also be employed to provide additional expertise in unique situations.

**Investment Vehicles:** The types of investments on which WWA provides advice includes, but is not limited to, stocks, bonds, mutual funds, exchange traded funds, hedge funds, venture capital opportunities, derivative debt and equity securities, private and public REITs, and other partnership interests such as those investing in mortgages. WWA may also offer advice on

other types of investments such as business opportunities. As a general rule, WWA does not recommend clients invest in initial public offerings (IPO's), leveraged ETF's, oil & gas limited partnerships, purchase securities using margin accounts or participate in short sales or options.

The vast majority of investments recommended by WWA are in the form of no-load mutual funds, exchange traded funds, individual stocks and bonds or equivalent investment products. The investment selection offered to clients may be limited by the knowledge and experience of the personnel of WWA and/or the resources available to it as a result of its relationships with custodians and other providers in the broader financial industry. In addition, as a result of these resources, certain investments may be available to clients of WWA that might not be available to members of the public at large. WWA believes that the breadth of choices available under these restrictions is sufficiently wide so as to effectively make available the full range of investment options that might conceivably be important for all but the rarest client. Suitable categories of investments are selected in accordance with the clients' attitudes about risk and their need for capital appreciation or income production, with tax considerations of all transactions weighted heavily. Within each category, individual securities are selected whose characteristics are most consistent with the particular objectives for which the category was chosen. Risk factors of the different investments are considered, particularly in light of the clients' willingness to assume risk and the client's ability to withstand investment losses. We also work with individuals regarding preferences for socially responsible investing when requested.

**Risk of Loss:** Investing in most securities involves a risk of loss that clients should be prepared to bear. We endeavor to limit this risk through broad global diversification, but this methodology will still subject the client to declines in the value of their portfolios, which can at times be dramatic. Invested assets are generally long-term in nature and any dollars that cannot be subjected to portfolio volatility should be "carved off" from the asset allocated portfolio. WWA invests in certain securities, such as small and mid-cap stocks and emerging market stocks, which may possess higher levels of volatility. We employ these vehicles as part of an overall strategic asset allocation for a client, and in doing so we possess a reasonable belief that the risk/return relationship for these securities will likely be beneficial for the investor over long periods of time.

WWA's investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

**Interest-rate Risk:** The risk that investment returns will be affected by changes in the level of interest rates. When interest rates increase, the prices and values of bonds decrease. When interest rates decrease, the prices and values of bonds increase.

**Market Risk:** The risk that investment returns will be affected by changes in the overall financial markets. When the markets as a whole increases or decreases, virtually all securities are affected to some degree.

**Reinvestment Rate Risk:** The risk incurred when an investment's income is reinvested at a lower rate than the rate that existed at the time the original investment was made. This risk is most prevalent when interest rates fall.

**Purchasing Power Risk (Inflation Risk):** The risk that inflation will affect the return of an investment in real dollars. In other words, the amount of goods that one dollar will purchase decreases with time. Investments that have low returns, such as savings accounts, are not likely to keep up with inflation. Investments with fixed returns, such as bonds, will decrease in value because their purchasing value will decrease with inflation.

**Business Risk:** The risk associated with a particular industry or firm. These are factors that affect the industry or firm, but do not affect the whole market. They include government regulations, management competency, or local or regional economic factors.

**Financial Risk:** The risk associated with the mix of debt and equity used to finance a firm. The greater the financial leverage, the greater the financial risk.

**Currency Risk (Exchange Rate Risk):** The risk that a change in the value of a foreign currency relative to the U.S. dollar will negatively affect a U.S. investor's return.

**Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.

**Option Risk:** The use of an option strategy may involve a high degree of risk and is not suitable for all investors.

In general, cash equivalents provide liquidity with minimum income, and a return of principal with no capital appreciation. Cash equivalents are, however, subject to purchasing power risk.

Fixed income investments provide current income. Usually, the longer the maturity of the security, the higher the income it will generate. Also, with longer maturities, fixed income investments will have greater price volatility and greater opportunity for capital gains or capital losses. Fixed income investments are subject to interest rate risk, reinvestment rate risk, and purchasing power risk. In addition, foreign bonds would be subject to currency rate risk and junk bonds would be subject to business risk and financial risk.

The return of principal for bond funds and funds with significant underlying bond holdings is not guaranteed. Mutual fund shares are subject to the same interest rate, inflation and credit risks associated with the underlying bond holdings. Lower-rated bonds are subject to greater fluctuations in value and risk of loss of income and principal than higher-rated bonds.

Equity investments are subject to greater volatility, thus providing a greater opportunity for capital gains, and a greater risk of capital losses. Equity investments offer little or no current income. Equity investments are subject to market risk and interest rate risk, while providing an opportunity to protect against purchasing power risk. Also, stock mutual funds, rather than individual equities, may limit the exposure to business risk and financial risk.

Investing outside the United States involves additional risks, such as currency fluctuations, periods of illiquidity, and price volatility. These risks may be heightened in connection with investments in developing countries. Small-company stocks entail additional risks, and they can fluctuate in price more than larger company stocks.

Investments are not FDIC-insured, nor are they deposits of or guaranteed by a bank or any other entity, so they may lose value.

Different types of investments involve varying degrees of risk, and the client should not assume that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended by WWA) will be profitable or equal to any specific performance level(s).

## INSURANCE

Insurance is at the heart of Risk Management, an essential element in the financial planning process. WWA does not sell insurance nor insurance products and receives no commissions, rebates or referral fees when its clients purchase such products from others. At the same time, because of the variety, complexity and number of possible products available to meet various insurance needs, WWA prefers to be as involved as much as possible when its clients consider the purchase of such products to meet their financial planning needs. When an insurance need arises, WWA will generally make a recommendation as to the generic type of product or products that would best address the specific need. If the client has an existing agent who can provide the needed product and related service, WWA will, at the client's request, work with that agent to ensure the client is getting the best product for that need. If the client does not have a preferred agent, WWA may work with a "no-load/low-load" provider or refer the client to an agent whom WWA believes can deliver the appropriate product(s) and related service. WWA has no formal affiliation with any such agent, but experience and industry knowledge has given us some insights about who might be able to do the needed tasks in an appropriate manner.

## **Item 9 - Disciplinary Information**

Registered Investment Advisers are required to disclose all material facts regarding any legal or disciplinary events of their firm or certain management personnel which would be material to your evaluation or WWA or the integrity of our management of investment portfolios. The firm has no legal or disciplinary events which are required to be disclosed under the guidelines of the SEC.

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

### THIRD PARTY AFFILIATIONS

**Financial Industry Activities:** None of the advisors of WWA are registered with FINRA to receive commissions on investment product sales. The firm's only revenue is that which comes directly from its clients. WWA does not accept sales commissions on any products or services recommended to clients.

**Affiliations:** Jalene Thompson Hahn is a member of the National Association of Personal Financial Advisors (NAPFA) and is entitled to refer to herself as a NAPFA Registered Financial Advisor. The organization is the nation's leading professional association dedicated to the advancement of Fee-Only comprehensive financial planning. Professionals who become NAPFA Registered Financial Advisors are committed to the three primary ideals of NAPFA:

1. The belief that clients are best served by a comprehensive approach to financial planning.
2. The highest levels of competency must be achieved and maintained.

3. Fee-Only compensation and a fiduciary relationship are vital to placing the interests of the client above all others.

All WWA advisors are authorized to use the CFP® mark and call themselves a Certified Financial Planner®. The marks are financial planning credentials awarded by the Certified Financial Planner Board of Standards Inc. (CFP Board) to individuals who meet education, examination, experience and ethics requirements. 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. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

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.

To perform appropriate transactions necessary to provide investment management services, WWA may from time to time establish non-binding relationships with one or more such companies including but not limited to, TD Ameritrade and Dimensional Fund Advisors (DFA). WWA does not compensate either directly or indirectly, other persons or companies for client referrals.

WWA participates in the institutional customer programs offered by TD Ameritrade Institutional (TDA) and Dimensional Fund Advisors (DFA). TDA is a division of TD Ameritrade Inc., member FINRA/SIPC, and unaffiliated SEC-registered broker-dealer and FINRA member. TDA offers to independent investment advisors services, which include custody of securities, trade execution, clearance, and settlement of transactions. WWA receives some benefits from TDA through its participation in the program. These benefits include but are not limited to discounts on software and research, and meetings or conferences for business and educational purposes. DFA provides research, meetings and conferences as well.

In addition, gifts of a de minimus nature including lunches or dinner, golf or entertainment may be received from time to time from referral sources. Also, de minimus gifts may be given to related professionals who may be potential referral sources.

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

### **Code of Ethics**

WWA Planning & Investments (WWA) has adopted a Code of Ethics ("Code") that establishes minimum standards of acceptable professional conduct for members of the firm. WWA encourages the highest ethical standards of its principals and employees, and we seek to avoid material conflicts of interest. Accordingly, the firm and its representatives do not receive any third party direct monetary compensation (i.e. commissions, 12b-1 fees or other fees) from brokerage firms, custodians or mutual funds companies.

WWA's goal is to be seen as a standard-bearer within our industry for "fiduciary responsibility". While no set of rules can possibly anticipate or relieve all potential conflicts of interest, we have adopted the following eight principles to guide our activities. They are:

**OBJECTIVITY:** WWA members strive to be as unbiased as possible when providing advice to clients. A member shall examine each and every situation without prejudice or personal agenda.

**CONFIDENTIALITY:** WWA members value client privacy and will keep all client data private, unless release is authorized by the client or required by law.

**COMPETENCE:** WWA members maintain a high level of knowledge and professional competence. A member shall only provide advice in areas in which he or she has knowledge and capability.

**FAIRNESS AND SUITABILITY:** Dealings and recommendations with clients will be in the client's best interests. WWA members will exercise care before making any product recommendations.

**INTEGRITY AND HONESTY:** WWA members will endeavor to avoid misunderstandings that can occur in normal interpersonal communications. Members should keep interactions with clients and other professionals at a level whereby there is no doubt or misinterpreting of the member's intentions.

**REGULATORY COMPLIANCE:** WWA members will strive to maintain conformity with legal regulations.

**FULL DISCLOSURE:** WWA members will fully describe methods of compensation and actual or potential conflicts of interest, prior to a client's engagement of his/her services, or as soon as they become known.

**PROFESSIONALISM:** WWA members shall conduct himself or herself in a way that is a credit to WWA at all times.

### **Participation Or Interest In Client Transactions**

The securities laws impose a fiduciary duty on investment advisers. As a fiduciary, we have an affirmative duty of care, loyalty, honesty, and good faith to act in the best interests of its clients. Compliance with this duty can be achieved by trying to avoid conflicts of interest and by fully disclosing all material facts concerning any conflict that does arise with respect to any client. This fiduciary duty is the core principle underlying WWA's Code of Ethics and represents the expected basis of all of our dealings with our clients. Our Code of Ethics is available to clients and prospective clients upon request.

WWA Planning & Investments or individuals associated with WWA may buy or sell securities identical to those recommended to clients. It is the policy of WWA that no person employed by WWA may purchase or sell any security prior to a transaction being implemented for an advisory account, thus preventing such employees from benefiting from transactions placed on behalf of advisory accounts. This rule does not apply to mutual fund transactions since trades are executed at the closing price at the end of the trading day. Since situations like those described above may represent a conflict of interest, WWA has established a Code of Ethics to ensure that its fiduciary responsibility is fulfilled.

### **Item 12 - Brokerage Practices**

#### **INVESTMENT AND BROKERAGE SELECTION**

For operational reasons, WWA recommends clients make use of TD Ameritrade (TDA) as custodian to hold client investment accounts. WWA evaluated custodians and believes TDA will provide WWA clients with a blend of execution services, commission costs and professionalism that will assist WWA in obtaining consistently good execution for transactions. While WWA has a reasonable belief that TDA is able to obtain best execution and competitive prices, WWA will not be independently seeking best execution price capability through other broker dealers. Clients are not required to use TDA as their custodian, however, WWA will generally decline acceptance of any client account that directs the use of a broker dealer other than TDA, as WWA believes that this would adversely affect WWA's duty to effectively serve the broader

investment needs of its clients. WWA may use discretion in selecting other broker dealers when special circumstances dictate, e.g., to obtain a broader listing of fixed income securities available for purchase. Any charges that may be assessed by the custodians are paid directly by the clients of WWA.

WWA will, as a matter of its services for clients, maintain a limited power of attorney on any client accounts and is specified as part of TDA's account application process. The limited power of attorney allows WWA to execute securities transactions on behalf of clients without prior client approval of the specific transaction. As a business practice, all transactions are executed in accordance with the client's stated investment objectives and requested parameters. WWA will generally recommend implementation of financial plans using WWA as the investment advisor. There is no requirement that the client do so. In circumstances where the services of WWA do not meet the needs of its clients, other advisors or brokers may be recommended.

For investment advisory clients, WWA will generally require that clients establish brokerage accounts with TD Ameritrade to maintain custody of client's assets and to effect trades for their accounts. Advisor may also utilize other broker/dealers to execute certain transaction when such broker/dealers provide demonstrably superior research and/or strategies.

TDA provides WWA with access to institutional trading and operations services, which may not be available to retail investors. These services generally are available to independent investment advisors at no charge. Services may include research, brokerage, custody, access to mutual funds and other investments that are otherwise available only to institutional investors or would require a significantly higher minimum initial investment. TDA may make available to WWA other products and services that benefit WWA but may not directly benefit its clients' accounts, such as products and services that assist WWA in managing and administering clients' accounts. These may include software and other technology that provide access to client account data (such as trade confirmations and account statements), facilitation of trade execution (and allocation of aggregated trade orders for multiple client accounts), provision of research, pricing information and other market data, facilitate payment of WWA's fees from its clients' accounts, and assistance with back-office support, recordkeeping and client reporting. TDA may also provide WWA with other services intended to help WWA manage and further develop its business enterprise. These services may include consulting, publications and presentations on practice management, information technology, business succession, regulatory compliance, and marketing. In addition, TDA may make available, arrange and/or pay for these types of services provided to WWA by independent third-parties. TDA may discount or waive fees they would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to WWA. The availability to WWA of the foregoing products and services is not contingent upon WWA committing to TDA any specific amount of business (assets in custody or trading). Use of TDA by WWA is determined by WWA operational efficiencies, availability of service for particular needs and by the pricing and quality of the custodial service.

## Item 13 – Review of Accounts

### ACCOUNT REVIEWS AND REPORTS

Investment accounts are reviewed by WWA internally no less often than yearly. Such a review and report includes addressing the following questions:

- How did your portfolio perform over the last period, on both a nominal and relative basis?
- Did the portfolio meet its benchmark?
- Did the portfolio meet its objective?
- What parts of your portfolio did well? Poorly?
- Is your current portfolio allocation in line with the target allocation set forth in the Investment Policy Statement, as updated? If not, what changes are called for?
- Does your target portfolio continue to make sense? Has a change in your personal circumstances or in the broader world occurred that suggests a need to change the target allocation?
- Have any investments in your portfolio performed so poorly over a reasonable time or has some other change occurred that suggests that a change in investments be made at this time?

Accounts may also be reviewed upon other triggering events such as:

- Receipt of new money to be invested.
- The request to liquidate and disburse a significant portion of the portfolio.
- A significant change in the financial circumstances of the client.
- A significant change in the status of the financial markets.

All such reports and recommendations are given final review by Jalene Hahn. Other members of the staff may prepare some or all of the analyses and/or recommendations under the direction of Jalene Hahn or other advisors with primary responsibility for that respective client relationship.

Client communications occur at several levels:

- Confirmations document all transactions and are provided to the client by the custodian upon the occurrence of each buy or sell transaction.
- Monthly statements of account holdings and a summary of the transactions during the month are prepared and distributed by the respective custodian.
- Market commentary, articles and newsletters on investment and financial planning topics may be provided to all clients throughout the year.
- Client meetings are generally held annually to review the account and the appropriateness of the holdings.
- Meetings, telephone calls, emails, and letters also provide information from time-to-time as circumstances warrant.

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

WWA does not accept commissions, rebates or referral fees as compensation for its services.

As referenced in Item 12 above, WWA may receive an indirect economic benefit from TDA. WWA, without cost (and/or at a discount), may receive support services and/or products from TDA.

## **Item 15 – Custody**

WWA Planning & Investments does not have custody of client funds other than the normal business practice of deducting management fees from client accounts.

You must receive at least quarterly account statements from your qualified custodian. If you are not receiving at least quarterly custodial account statements, please contact us at the number on the cover page of this brochure.

## **Item 16 – Investment Discretion**

WWA may render discretionary investment management services to clients. Clients sign a “Limited Power of Attorney” either as a stand-alone document or as part of the account opening paperwork.

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

As the legal owner of the securities in their accounts, clients retain responsibility for voting any proxy material associated with the securities.

## **Item 18 – Financial Information**

WWA does not receive fees more than six months in advance.

## **Item 19 – Requirements for State-Registered Advisers**

Advisory affiliates (investment advisor representatives) must be investment and/or financial planning professionals. Professional staff members possess a BA, BS, or MBA degree or equivalent experience and are either credentialed as Certified Financial Planner®, Certified Public Accountant, Chartered Financial Analyst or enrolled in a program designed to achieve such a designation. Other staff members bring other appropriate skills and experiences.

### **Jalene Thompson Hahn— Certified Financial Planner®**

Jalene was born in 1962. She graduated in 1984 from Indiana University with a BS in Finance and earned her MBA from Indiana University in 1991. Jalene began WWA Planning & Investments in 2015. From 2003-2015 Jalene worked at Warren Ward Associates Financial Planning. She earned her Certified Financial Planner® designation in January of 2008 and completed coursework in Global Financial Planning in 2021.

Jalene’s prior work experience includes serving as a Financial Analyst for Irwin Management Company, as a Systems Analyst/Programmer for Cummins Engine Company, and as a Child Care Coordinator for the Bartholomew County Step Ahead Council. She has also been an Adjunct Faculty member of Indiana University Purdue University Columbus. Jalene was a full-time homemaker for five years before joining WWA.

Jalene is also an active member in the community. She was a founding member of the Bartholomew County Women's Giving Circle. She formed the Bartholomew County Financial Literacy Coalition in 2008 and chaired the Bartholomew County Money Smart Week activities for 3 years. She is an active member of the St. Bartholomew Choir and has performed with them at Carnegie Hall in New York City and at a Papal Mass at St. Peter's Basilica in Rome, Italy. When her boys were in school, she was active in their activities which included serving as concessions manager and Judge for the Columbus East High School Speech team. She and her husband were Coaches for the St. Bartholomew School FIRST Lego League team for 3 years. Past affiliations include serving as a long-term board member for the Y-MED organization, United Way Allocations Panel, Zonta International, the Indianapolis Skyline Club and participated in the Book Buddies Program. Jalene is a regular columnist for the Indianapolis Business Journal and was a guest columnist for the Columbus Republic She Magazine. In addition to her writing, she is an active speaker on a variety of financial topics.

Additional information about Jalene Thompson Hahn is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Click on the "Investment Adviser Search" link and then search for "Individual" using Jalene's CRD number 4914113.

### **Warren Ward—Certified Financial Planner®**

Warren was born in 1946. He attended college for three years until 1967, when he created Commercial Flocking, a manufacturing business. Warren remained a business owner/manager in manufacturing until changing careers in 1991 to investments. He worked for regional investment firms National City Investments and Wedgewood Partners (associated with Citizens Bank) prior to going into business for himself with Linsco/Private Ledger Corp. in February of 1999. He moved to a fee-only practice in 2005. Warren earned the Certified Financial Planner® designation in June of 2001 and was Principle of Warren Ward Associates until December 2015. He transitioned to a part-time associate at WWA Planning & Investments in 2017.

In September of 2009 Warren was forced to file for personal bankruptcy. The case was discharged (closed) in January of 2010. As required by the CFP Board's Standards of Professional Conduct, Warren reported his personal bankruptcy to the CFP Board. In August 2011, following a hearing by CFP Board's Disciplinary and Ethics Commission ("Commission"), the CFP Board issued a Letter of Admonition. A Letter of Admonition is one of the least serious disciplinary options.

Warren is active in the community and is a member of First Presbyterian Church. He served on the Board of Directors for the Columbus Indiana Philharmonic and is past program chair for the South Central Chapter of the Indiana Society of Accountants. He has been involved with or continues to be involved with Su Casa, Volunteers in Medicine, Columbus Area Arts Council, Columbus Area Chamber of Commerce, Hoosier Hills Estate Planning Conference, Rotary, Columbus Economic Development Council, Save The Commons, Presbyterian Church Foundation of Columbus and participated in the Book Buddies program. In addition to his community activities and "day job", he was also the manager for the local rock band 40 Years of College. He was an Adjunct Professor with Indiana University-Purdue University Columbus, teaching personal financial planning courses

He is a prolific writer and is often quoted in local and national publications. He is the author of "Your Money and Your Life: Brief Lessons in Everyday Economics".

## Additional Information

None.

Additional information about Warren Ward is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Click on the "Investment Adviser Search" link and then search for "Individual" using Warren's CRD number 2161447.

## **Andy Pajakowski**

After 26 years with Cummins, Andy retired and joined WWA Planning & Investments in 2020 as an Investment Analyst. He passed his Series 65 exam in February of 2021.

Andy completed his Bachelors Degree in Mechanical Engineering at Purdue University in 1986, and joined General Electric's manufacturing management program. He spent several years in various manufacturing roles at GE before moving to the company's Aircraft Engine Division where Andy spent five years working on advanced aircraft engine control systems for customers that included the NASA space agency.

He obtained his Master's Degree in Mechanical Engineering at the University of Cincinnati in 1993, and joined Cummins where he worked in a variety of engineering management roles, eventually leading the company's Industrial Controls Department.

Andy has been awarded three patents for his engineering work while at Cummins. He was recognized in 2008 with the company's Julius Perr Innovation Award, Cummins' highest honor for engineering.

Andy began applying his engineering background in new ways when he moved into sales and marketing in 2005, leading Cummins' largest global industrial account. He was asked to take a leadership role in recruiting in 2008 before moving back into sales and marketing in the mining division in 2011. In 2014, he took a leadership role in Cummins' North America Engine Business as General Manager of National Accounts.

Additional information about Andy Pajakowski is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Click on the "Investment Adviser Search" link and then search for "Individual" using Andy's CRD number 7347070.