Item 1 – Cover Page



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September 30, 2024

This Brochure provides information about the qualifications and business practices of Pathfinder Planning LLC. If you have any questions about the contents of this Brochure, please contact us at 704.301.7522 or <u>info@pathfinderplanningllc.com</u>. 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 Pathfinder Planning LLC also is available on the SEC's website at <u>www.adviserinfo.sec.gov</u>.

You may view a copy of the current Brochure on the website at <u>www.pathfinderplanningllc.com</u>, or you may request one by contacting Pamela J. Horack, CFP[®] at 704.301.7522 or <u>info@pathfinderplanningllc.com</u>.

Item 2 – Material Changes

Brochure Date: September 30, 2024 Previous Brochure: January 18, 2024

Pathfinder Planning LLC will send a notice of any material changes made during the year to all active clients. Active clients will also receive an annual updated Brochure by the end of March each year.

In September 2024, we submitted an other-than-annual brochure update.

Item 5 – Fees and Compensation

Financial Planning Services Fee Schedule

Fee ranges for planning services have been updated.

Portfolio Management Services Fee Schedule

Schedule A and B for portfolio management fees have been updated.

Item 14 - Client Referrals and Other Compensation

SMARTER Budgeting and Your Financial Mom activities were added as wholly owned subsidiaries of Pathfinder Planning LLC.

Item 3 -Table of Contents

tem 1 – Cover Page	i
tem 2 – Material Changes	. ii
tem 3 -Table of Contents	iii
tem 4 – Advisory Business	. 1
tem 5 – Fees and Compensation	. 3
tem 6 – Performance-Based Fees and Side-By-Side Management	. 7
tem 7 – Types of Clients	. 7
tem 8 – Methods of Analysis, Investment Strategies and Risk of Loss	. 7
tem 9 – Disciplinary Information	.9
tem 10 – Other Financial Industry Activities and Affiliations1	10
tem 11 – Code of Ethics1	10
tem 12 – Brokerage Practices1	10
tem 13 – Review of Accounts1	12
tem 14 – Client Referrals and Other Compensation1	15
tem 15 – Custody1	16
tem 16 – Investment Discretion1	16
tem 17 – Voting Client Securities1	16
tem 18 – Financial Information1	17
tem 19 – Requirements for State-Registered Advisers1	17

Form ADV Part 2B - Advisor Information

Item 4 – Advisory Business

<u>Mission</u>

Pathfinder Planning LLC was formed in June of 2010 by Pamela J. Horack, CFP[®]. The company mission is to be a blessing to young adults and working families as we guide them to achieve their full financial potential using our Five Step Path to a solid Financial Tower.

Assets Under Management

As of December 31, 2023, Pathfinder Planning reported \$16,357,460 in regulatory Assets Under Management (AUM). The firm gave financial planning advice on \$12, 247,478 in securities investments held outside the firm, known as Assets Under Advisement, (AUA). This number is calculated by taking client Total Assets, subtracting Non-Liquid Assets, and subtracting Assets Under Management.

Financial Planning Services

We help our clients answer questions and meet their needs with easy-to-understand recommendations, including, but not limited to:

- Budgeting and Cash flow
- Retirement Planning
- Insurance Review

- College Education Planning
- Investment Review
- Comprehensive Planning

Financial Planning Process

Once a prospect has agreed to an engagement and signed the Client Agreement, the following process for planning begins.

- Get Organized: Client securely links and/or uploads as much information as possible to our planning software, and the Planner enters additional information. At the first meeting, we review the information, discuss goals, and make updates as needed.
- Explore: At this meeting, we focus on the client's risk and insurance needs.
- Brainstorm: At this meeting, we discuss current accounts and model various scenarios to help meet your retirement and other goals.
- Discover: Here, we catch up on any missing pieces as needed to move your plan forward.
- Present: The last meeting is to review your overall plan recommendations and the Action Items needed to meet your goals.

Note: Information related to tax and legal consequences that is provided as part of the financial plan is for informative purposes only. Clients are instructed to contact their tax or legal advisers for personalized advice.

Plan Implementation

The Client may retain Pathfinder Planning to implement and monitor plan recommendations.

<u>Ongoing Planning Service</u>: We provide implementation assistance for client plans that includes budgeting, insurance, 401(k) or other employer sponsored plan, college, and other financial needs.

<u>Asset Management:</u> Use of technology to assist the client in opening and maintaining investment accounts.

<u>Comprehensive Planning</u>: All-in-one financial planning and asset management services.

<u>Periodic Checkup</u>: Client may re-engage Pathfinder Planning LLC on an as-needed basis. The company recommends annual financial check-ups once a plan is complete.

Estate Planning and Coordination Services

Pathfinder Planning LLC offers Estate Planning and Coordination as a stand-alone service to our clients. This service assists clients with gathering information for their estate plan so that they can provide outside firms with information to create estate planning documents.

Pathfinder Planning LLC may use the services of a third-party scrivener service, as well as local estate planning attorneys for Estate Planning review and document preparation. Our Estate Coordination services allow us to work with our clients and an online service or your chosen attorney, to gather the necessary information as a part of this service.

The fees associated with Estate Planning Coordination Services are separate and in addition to ongoing financial planning or advisory services. Fees are based on services provided and contracted separately from financial planning or portfolio management services. See Item 5 – Fees and Compensation.

Portfolio Management Services

Pathfinder Planning LLC offers discretionary portfolio management services. Discretionary portfolio management service means that we do not need to obtain our clients' approval prior to making any transactions in their account(s). We do not participate in a wrap fee program.

Our investment advice is tailored to meet our clients' needs and investment objectives. To do this, we work together to gather your financial information, determine your goals, and decide how much risk to take in your investments. The information we gather helps us create and implement an asset allocation and investment strategy to meet your goals.

Pathfinder Planning LLC mainly uses mutual funds and exchange traded funds, ETFs, in its portfolio management programs. However, we reserve the right to invest in any other type of security including, but not limited to, individual stocks and bonds, U.S. government securities, corporate

debt securities, commercial paper, municipal securities, certificates of deposit. We do not invest directly in futures contracts, private placements, hedge funds or non-publicly traded securities.

We will monitor your portfolio's performance on a continuous basis, and rebalance the portfolio whenever necessary, as changes occur in market conditions, your financial circumstances, or both.

Recommendation of Sub-Advisers

As part of our overall portfolio management strategy, we may also recommend sub-advisers to manage all or a portion of your account. All sub-advisers recommended by our company must either be registered as investment advisers or exempt from registration requirements. Factors that we take into consideration when making our recommendations include, but are not limited to, the following: the sub-advisor's investment performance, methods of analysis, fees, your financial needs, investment goals, risk tolerance, and investment objectives. We will periodically monitor the sub-adviser's performance to ensure its management and investment style remains aligned with your investment goals and objectives.

Clients will consult with Pathfinder Planning to understand and evaluate the sub-advisor's investment management portfolios and determine which of those portfolios are suitable for Client based on Client's goal and objectives. Client will discuss with Advisor their investment needs, goals and objectives, and review performance and the continued suitability of the sub-advisor's Portfolio for the Client. Clients must work through Pathfinder Planning to access the sub-advisor's investment management services.

Item 5 – Fees and Compensation Financial Planning Services Fee Schedule

Type of Service	Fees and Billing	Deposit	Payment
Financial Planning Services	Detailed in the Client Agreement. Financial Plans generally range from \$3000 to \$7000. Fees will vary depending on the scope of work.	Deposit is detailed in the Client Agreement and may vary according to the services needed.	Fees and Payment Schedule are detailed in the Client Agreement and will vary according to the services needed.
Ongoing Planning Services	Detailed in the Client Agreement. Service requires a one-year commitment and is billed monthly. Available only after a Financial Plan has been created. Monthly fee ranges from \$300 to \$500 per month based on complexity.	None	Monthly payment date and amount is detailed in the Client Agreement.
Estate Planning and Coordination	Services provided by an online scrivener. We assist in gathering Client information and documentation and provide to the estate scrivener. Fees generally range from \$1000 to \$2000.	None	Payment is detailed in the Client Agreement. Payments due and payable as defined in the Client Agreement.

	1		
Projects /	\$300.00 per hour based on an	The lesser of \$500 or ½ of	Payment is detailed in the Client
Hourly	estimated number of hours. Projects	the lower end of the	Agreement with balance due and
Planning	spanning more than three months will	estimated project fee.	payable at the end of the
	be billed monthly.		engagement as defined in the
			Client Agreement.

Alternate Fees

Pathfinder Planning LLC may negotiate alternate fees. The company may:

- Offer a flat fee based on a reduced hourly rate for a minimum number of hours.
- Negotiate a reduced hourly fee.
- Waive fees or provide pro-bono work under special circumstances.
- Offer special promotional fees for services.
- Offer online courses or programs for a fee.
- Offer seminars and educational workshops for a fee.
- Teach classes at a public or private college or university for a negotiated fee.
- Offer 401(k) education and advisory services for businesses for a negotiated fee.

Financial Planning Cancellation Policy

With written notice, either party may end a planning contract within 5 days of signing the Client Agreement with no fees due. If a Client terminates the engagement after 5 days, the Client is responsible for any hourly charges incurred in the preparation of their plan. Money owed to Pathfinder Planning LLC will be invoiced. Any unused portion of a deposit will be refunded.

Service Provider Policy

Pathfinder Planning LLC is not affiliated with any banks, broker dealers, tax services, attorneys, insurance companies, or financial service providers. Clients are free to purchase recommended products and services through any provider of their choice.

Asset allocation and other employer sponsored retirement plan recommendations must be made within the confines of the plan. For example, a 401(k) plan that uses Fidelity as a third-party provider must use the Fidelity trading platform.

General Information on Financial Planning Fees

PPLLC does not represent, warrant, or imply that the financial plan created by our company can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections or declines.

PPLLC reviews client fees annually. PPLLC may change and/or update fees by giving written notice to the client at least 30 days prior to the change.

Portfolio Management Services Fee Schedule

For portfolio management services, Pathfinder Planning LLC charges an annual fee based upon a percentage of the market value of the assets under management. The annual portfolio management fee per account is determined based on the following fee schedules.

Schedule A - Portfolios Held with Betterment for Advisors

Account Value	Annual Advisory Fee	Fee Calculation
\$0 - \$249,999	1.50%	• Asset-based fees are calculated as a prorated amount of
\$250,000 - \$999,999	1.00%	a client's average daily balance over a quarter.
\$1,000,000 and above	0.75%	 Fees are automatically debited from the client account in arrears at the end of the quarter.
Betterment for Advisors will deduct the entire advisory fee for both Betterment for Advisors and Pathfinder Planning LLC and forward the Adviser's portion of the fee to the Adviser. Your fees will be available on your Account Statement. Pathfinder Planning LLC does not send separate fee billing information for these accounts.		

Schedule B - Portfolios Held with Charles Schwab & Co.

Account Value	Annual Advisory Fee	Fee Calculation
\$0 - \$249,999	1.50%	Asset-based fees are automatically debited from the client
\$250,000 - \$999,999	1.00%	account in advance for the upcoming quarter. Fees are calculated based on the closing market value of the prior
\$1,000,000 and above	0.75%	quarter.
		 Accounts opened during a quarter will be charged a pro-rata fee that will be assessed at the beginning of the first full calendar quarter that Pathfinder Planning manages the account.
		• If the client terminates services, any unearned portion of the investment management fee will be refunded to the client.
Clients are responsible	for Custodian fee	s, including trading fees and other expenses as stated in Charles

- Clients are responsible for Custodian fees, including trading fees and other expenses as stated in Charles Schwab & Co.'s current Fee Schedule.
- Your fees will be available on your Account Statement. Pathfinder Planning LLC does not send separate fee billing information for these accounts. Billing detail is available on request.

Portfolio management fees may be negotiable depending on factors such as the amount of assets under management, range of investments, complexity of the client's financial circumstances, or other factors that impact the expense and/or risk of managing the account. The exact fee paid by

the client will be clearly stated in the Investment Agreement and/or Fee Adjustment form signed by the client and Pathfinder Planning LLC.

Cancellation Policy

The Investment Agreement between Pathfinder Planning LLC and the client will continue in effect until either party terminates the Agreement in accordance with the terms of the Agreement. Upon termination, all assets will be held at the Custodian and it will be Client's responsibility to instruct the Custodian as to the final disposition of assets, unless the Client specifically notifies Pathfinder Planning LLC to liquidate or take other action.

As of the date of termination, Pathfinder Planning LLC will no longer be the investment advisor of record, and it will be Client's responsibility to monitor the timely disposition of the account and take all future actions in regard to the management of the account.

For accounts paid in advance, any pro-rated fees will be refunded based on termination date.

Additional Fees and Expenses

Clients may incur certain charges imposed by custodians, brokers, and other third parties such as: custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions.

Mutual fund and exchange traded funds (ETFs) also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees, and commissions are exclusive of and in addition to Pathfinder Planning's fee. Pathfinder Planning does not receive any portion of these commissions, fees, and costs.

Clients who choose to invest directly in a mutual fund or ETF do not receive the asset management services provided by Pathfinder Planning LLC which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and the fees charged by Pathfinder Planning LLC to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

General Information on Advisory Services and Fees

PPLLC does not represent, warrant, or imply that the services or methods of analysis employed by our company can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections or declines.

PPLLC does not have custody of any client funds or securities. The services of a qualified and independent custodian are used for asset management services.

PPLLC may change and/or update fees by giving written notice to the client at least 30 days prior to the change.

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

Performance-based fees are fees that are charged based on a share of capital gains or capital appreciation of an asset. Pathfinder Planning LLC does not charge performance-based fees.

Item 7 – Types of Clients

Pathfinder Planning LLC provides Financial Planning Advice and Asset Management to Individuals, Couples, Other Registered Investment Advisers, and Businesses. The company does not require a minimum amount of assets or net worth in order to become a client.

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

We primarily practice passive investment management. Passive investing involves building portfolios that are comprised of various distinct asset classes. The asset classes are weighted in a manner to achieve the desired relationship between correlation, risk, and return. Funds that passively capture the returns of the desired asset classes are placed in the portfolio. The funds that are used to build passive portfolios are typically index mutual funds or exchange-traded funds.

Passive investment management is characterized by low portfolio expenses (i.e., the funds inside the portfolio have low internal costs), minimal trading costs (due to infrequent trading activity), and relative tax efficiency (because the funds inside the portfolio are tax efficient and turnover inside the portfolio is minimal).

In contrast, active management involves a manager(s) who employ some method, strategy, or technique to construct a portfolio that is intended to generate returns that are greater than the broader market or a designated benchmark. Active management often involve less diversification, more trading, and higher costs.

All investing strategies we offer involve risk and may result in a loss of your original investment which you should be prepared to bear. Many of these risks apply equally to stocks, bonds, commodities, and any other investment or security. Material risks associated with our investment strategies are listed below.

Market Risk: Market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the value of the investment regardless of the operational success of the issuer's operations or its financial condition.

Strategy Risk: The Adviser's investment strategies and/or investment techniques may not work as intended.

Small and Medium Cap Company Risk: Securities of companies with small and medium market capitalizations are often more volatile and less liquid than investments in larger companies. Small

and medium cap companies may face a greater risk of business failure, which could increase the volatility of the Client's portfolio.

Turnover Risk: At times, the strategy may have a portfolio turnover rate that is higher than other strategies. A high portfolio turnover would result in correspondingly greater brokerage commission expenses and may result in the distribution of additional capital gains for tax purposes. These factors may negatively affect the account's performance.

Limited markets: Certain securities may be less liquid (harder to sell or buy) and their prices may at times be more volatile than at other times. Under certain market conditions, we may be unable to sell or liquidate investments at prices we consider reasonable or favorable or find buyers at any price.

Concentration Risk: Certain investment strategies focus on particular asset-classes, industries, sectors, or types of investment. From time to time these strategies may be subject to greater risks of adverse developments in such areas of focus than a strategy that is more broadly diversified across a wider variety of investments.

Interest Rate Risk: Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true: bond prices generally rise when interest rates fall. In general, fixed income securities with longer maturities are more sensitive to these price changes. Most other investments are also sensitive to the level and direction of interest rates.

Legal or Legislative Risk: Legislative changes or Court rulings may impact the value of investments, or the securities' claim on the issuer's assets and finances.

Inflation: Inflation may erode the buying power of your investment portfolio, even if the dollar value of your investments remains the same.

Risks Associated with Securities

Apart from the general risks outlined above which apply to all types of investments, specific securities may have other risks.

Common stocks may go up and down in price quite dramatically, and in the event of an issuer's bankruptcy or restructuring could lose all value. A slower-growth or recessionary economic environment could have an adverse effect on the price of all stocks.

Corporate Bonds are debt securities to borrow money. Generally, issuers pay investors periodic interest and repay the amount borrowed either periodically during the life of the security and/or at maturity. Alternatively, investors can purchase other debt securities, such as zero-coupon bonds, which do not pay current interest, but rather are priced at a discount from their face values and their values accrete over time to face value at maturity. The market prices of debt securities fluctuate depending on factors such as interest rates, credit quality, and maturity. In general, market prices of debt securities decline when interest rates rise and increase when interest rates fall. The longer the time to a bond's maturity, the greater its interest rate risk.

Credit Risk: Investments in bonds and other fixed income securities are subject to the risk that the issuer(s) may not make required interest payments. An issuer suffering an adverse change in its financial condition could lower the credit quality of a security, leading to greater price volatility of the security. A lowering of the credit rating of a security may also offset the security's liquidity, making it more difficult to sell. Funds investing in lower quality debt securities are more susceptible to these problems and their value may be more volatile.

Municipal Bonds are debt obligations generally issued to obtain funds for various public purposes, including the construction of public facilities. Municipal bonds pay a lower rate of return than most other types of bonds. However, because of a municipal bond's tax-favored status, investors should compare the relative after-tax return to the after-tax return of other bonds, depending on the investor's tax bracket. Investing in municipal bonds carries the same general risks as investing in bonds in general. Those risks include interest rate risk, reinvestment risk, inflation risk, market risk, call or redemption risk, credit risk, and liquidity and valuation risk.

Exchange Traded Funds prices may vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track underlying benchmarks as expected. ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value; (ii) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. The Adviser has no control over the risks taken by the underlying funds in which the Clients invest.

Investment Companies Risk. When a Client invests in open-end mutual funds or ETFs, the Client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the Client will incur higher expenses, many of which may be duplicative. In addition, the Client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives).

Item 9 – Disciplinary Information

Registered Investment Advisors are required to disclose any legal or disciplinary events that impact your evaluation of the company. Pathfinder Planning LLC does not have any legal or disciplinary issues to report.

Item 10 – Other Financial Industry Activities and Affiliations

Pathfinder Planning LLC is not affiliated with any broker-dealer or other financial or service provider. Fees paid to Pathfinder Planning LLC for financial planning and advisory services are separate from fees charged by other firms, advisers, and professionals.

The company does not receive fees or commissions from any products or services recommended. Be sure you understand all fee schedules before engaging additional services. Be sure to read all prospectuses before purchasing mutual funds and other investments.

Item 11 – Code of Ethics

Pathfinder Planning LLC follows the Code of Ethics and Practice Standards defined by the Certified Financial Planner Board of Standards. The company has adopted a Code of Ethics for all employees. The Code describes the standard of business conduct and fiduciary duty to our clients. The Code of Ethics includes details on client confidentiality, ban on insider trading, restrictions on gifts, employee securities trading, and employee education.

All employees must acknowledge the terms of the Code of Ethics annually, or as amended. Employees of Pathfinder Planning LLC may hold the same securities that are recommended to Clients. Employees do not receive preferential treatment for trades over Clients. There may be individual stocks that we do not comment or advise on due to potential conflicts of interest. Employees may receive a reduced annual fee for their accounts. The company maintains records of personal securities transactions. Pathfinder Planning LLC complies with the rules that prohibit insider trading.

Anyone may request a copy of our company's Code of Ethics by contacting us via mail, email, or phone.

Item 12 - Brokerage Practices

Factors Used to Select Custodians

Advisor does not have any affiliation with any custodian we recommend. Specific custodian recommendations are made to the Client based on their need for such services. We recommend custodians based on the reputation and services provided by the firm.

In recommending custodians, we have an obligation to seek the "best execution" of transactions in Client accounts. The determinative factor in the analysis of best execution is not the lowest possible commission cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of the custodian's services. The factors we consider when evaluating a custodian for best execution include, without limitation, the custodian's:

• Combination of transaction execution services and asset custody services (generally without a separate fee for custody);

- Capability to execute, clear, and settle trades (buy and sell securities for your account);
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.);
- Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds (ETFs), etc.);
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services;
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices;
- Reputation, financial strength, security and stability;
- Prior service to us and our clients.

With this in consideration, our firm recommends Charles Schwab & Co., Inc., a registered brokerdealer, member FINRA and SIPC ("Schwab") as well as Betterment for Advisors. Although Clients may request us to use a custodian of their choosing, we generally recommend that Clients open brokerage accounts with Schwab and/or Betterment for Advisors. We are not affiliated with Schwab or Betterment for Advisors. The Client will ultimately make the final decision of the custodian to be used to hold the Client's investments by signing the selected custodian's account opening documentation.

Research and Other Soft-Dollar Benefits

Advisor does not have any soft-dollar arrangements with custodians whereby soft-dollar credits, used to purchase products and services, are earned directly in proportion to the amount of commissions paid by a Client. However, as a result of being on their institutional platform, Schwab may provide us with certain services and products that may benefit us. All such soft dollar benefits are consistent with the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended.

Schwab Advisor Services[™] is Schwab's business serving independent investment advisory firms like us. They provide our Clients and us with access to their institutional brokerage services (trading, custody, reporting and related services), many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our Clients' accounts, while others help us manage and grow our business. Schwab's support services are generally available on an unsolicited basis (we don't have to request them) and at no charge to us. The benefits received by Advisor or its personnel do not depend on the number of brokerage transactions directed to Schwab. As part of its fiduciary duties to Clients, Advisor at all times must put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits by Advisor or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Advisor's choice of Schwab for custody and brokerage services. This conflict of interest is mitigated as Advisor regularly reviews the factors used to select custodians to ensure our recommendation is appropriate. Following is a more detailed description of Schwab's support services:

1. Services that benefit you. Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of Client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum

initial investment by our Clients. Schwab's services described in this paragraph generally benefit you and your account.

- 2. Services that may not directly benefit you. Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our Clients' accounts. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or a substantial number of our Clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:
 - provide access to Client account data (such as duplicate trade confirmations and account statements)
 - facilitate trade execution and allocate aggregated trade orders for multiple Client accounts
 - provide pricing and other market data
 - facilitate payment of our fees from our Clients' accounts
 - assist with back-office functions, recordkeeping, and Client reporting
- 3. Services that generally benefit only us. Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:
 - Educational conferences and events
 - Consulting on technology, compliance, legal, and business needs
 - Publications and conferences on practice management and business succession
- 4. Your brokerage and custody costs. For our Clients' accounts that Schwab maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. Certain trades (for example, many mutual funds and ETFs) may not incur Schwab commissions or transaction fees.

Brokerage for Client Referrals

We receive no referrals from a custodian, broker-dealer or third party in exchange for using that custodian, broker-dealer or third party.

Clients Directing Which Broker/Dealer/Custodian to Use

We do recommend a specific custodian for Clients to use, however, Clients may custody their assets at a custodian of their choice. Clients may also direct us to use a specific custodian to execute transactions. By allowing Clients to choose a specific custodian, we may be unable to achieve the most favorable execution of Client transactions and this may cost Clients money over using a lowercost custodian.

Aggregating (Block) Trading for Multiple Client Accounts

Investment advisers may elect to purchase or sell the same securities for several clients at approximately the same time when they believe such action may prove advantageous to clients. This process is referred to as aggregating orders, batch trading or block trading. We do not engage in block trading. It should be noted that implementing trades on a block or aggregate basis may be less expensive for client accounts; however, it is our trading policy to implement all client orders on an individual basis. Therefore, we do not aggregate or "block" client transactions. Considering the types of investments we hold in advisory client accounts, we do not believe clients are hindered in any way because we trade accounts individually. This is because we develop individualized investment strategies for clients and holdings will vary. Our strategies are primarily developed for

the long-term and minor differences in price execution are not material to our overall investment strategy.

Research and Other Soft Dollar Benefits received from Betterment for Advisors

Betterment for Advisors serves as broker dealer to Betterment for Advisors, an investment and advice platform serving independent investment advisory companies like us. Betterment for Advisors also makes available various support services which may not be available to Betterment's retail customers. Some of those services help us manage or administer our clients' accounts, while others help us manage and grow our business. Betterment for Advisors' support services are generally available on an unsolicited basis (we don't have to request them) and at no charge to us. Following is a more detailed description of Betterment for Advisors' support services:

Services That Benefit You: Betterment for Advisors includes access to a range of investment products, execution of securities transactions, and custody of client assets through Betterment for Advisors. Betterment for Advisors' services described in this paragraph generally benefit you and your account.

Services That May Not Directly Benefit You: Betterment for Advisors also makes available to us other products and services that benefit us, but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts, such as software and technology that may:

- Assist with back-office functions, recordkeeping, and client reporting of our clients' accounts. Provide access to client account data (such as duplicate trade confirmations and account statements).
- Provide pricing and other market data.
- Assist with back-office functions, recordkeeping, and client reporting.

Services That Generally Benefit Only Us: By using Betterment for Advisors, we will be offered other services intended to help us manage and further develop our business enterprise. These services may include:

- Educational conferences and events.
- Consulting on technology, compliance, legal, and business needs.
- Publications and conferences on practice management and business succession.

Pathfinder Planning LLC understands its duty for best execution and considers all factors in making recommendations to clients. The research services we receive from Schwab/TD Ameritrade and Betterment for Advisors may be useful in servicing all Pathfinder Planning LLC clients and may not be used in connection with any particular account that may have paid compensation to the firm providing such services. While Pathfinder Planning LLC may not always obtain the lowest rate, we believe the rate is reasonable in relation to the value of the brokerage and research services provided by these custodians.

Third Party Discretionary Platform

Pathfinder Planning LLC may use a third-party platform, Pontera, to facilitate management of held away assets such as defined contribution plan participant accounts, with discretion. The platform allows us to avoid being considered to have custody of Client funds since we do not have direct access to Client log-in credentials to affect trades. We are not affiliated with Pontera in any way and receive no compensation from them for using their platform. A link will be provided to the Client allowing them to connect an account(s) to the platform. Once the Client account(s) are connected to the platform, PPLLC will review the current account allocations. When deemed necessary, PPLLC will rebalance the account considering client investment goals and risk tolerance, and any change in allocations will consider current economic and market trends. The goal is to improve account performance over time, minimize loss during difficult markets, and manage internal fees that harm account performance. Client account(s) will be reviewed at least quarterly and allocation changes will be made as deemed necessary.

Brokerage for Client Referrals

We may receive Financial Planning or Asset Management Prospect referrals from the brokerdealers or Custodians in which we have an institutional advisory arrangement.

Directed Brokerage

Clients who choose to manage their own funds outside of Pathfinder Planning LLC's recommended custodians are responsible for all aspects of managing their own accounts. Pathfinder Planning LLC may be granted limited power of attorney to view only account information. In these situations, our company is not authorized to negotiate commissions, cannot obtain volume discounts or best execution, and does not rebalance client accounts. In addition, under these circumstances a disparity in commission charges may exist between the commissions charged to clients who direct our company to use a particular broker/dealer and those that don't.

Trade Aggregation/Block Trading

Some Registered Investment Advisers execute Client accounts on an aggregated basis to lower expenses. We may, from time to time, use trade aggregation.

This involves combining multiple orders for shares of the same securities purchased for advisory accounts we manage (this practice is commonly referred to as "block trading"). We will then distribute a portion of the shares to participating accounts in a fair and equitable manner. The distribution of the shares purchased is typically proportionate to the size of the account, but it is not based on account performance or the amount or structure of management fees. Subject to our discretion, regarding particular circumstances and market conditions, when we combine orders, each participating account pays an average price per share for all transactions and pays a proportionate share of all transaction costs. Accounts owned by our firm or persons associated with our firm may participate in block trading with your accounts; however, they will not be given preferential treatment.

Outside Managers used by Pathfinder Planning LLC may block Client trades at their discretion. Their specific practices are further discussed in their ADV Part 2A, Item 12.

Item 13 – Review of Accounts

Financial Plan Reviews

Pathfinder Planning LLC sees Clients on a limited engagement and does not provide on-going or automatic reviews for one-time plans unless the client opts for additional Ongoing Planning and Implementation Services. The company recommends annual financial check-ups and regular portfolio reviews. The Client is responsible for initiating this review; however, the company will send follow-up reminders for this service.

Clients who continue Financial Planning services through the Ongoing Planning Service program have a built-in review schedule and receive regular contact and follow up for their plans.

Portfolio Management Account Reviews

Pathfinder Planning LLC monitors client accounts that fall under its investment management program. Accounts are monitored on a regular basis with a formal account review at least annually.

Additional reviews may be offered in certain circumstances. Factors for an additional review include, but are not limited to: changes in economic conditions, changes in the client's financial situation or investment objectives, or a client's request.

Clients will receive statements directly from their account custodian(s) on at least a quarterly basis. We encourage our clients to compare custodial account statements with statements prepared by our company for accuracy. Clients are encouraged to notify our company if changes occur in their personal financial situation.

Item 14 - Client Referrals and Other Compensation

Pathfinder Planning LLC may provide financial planning services to other investment advisers. Fees and payments are negotiated. SMARTER Budgeting and Your Financial Mom activities are wholly owned subsidiaries of Pathfinder Planning LLC.

The company may provide referrals to legal, accounting, tax, insurance, or other professionals as a service to our Clients. Neither Pathfinder Planning LLC or our Financial Planners receive referral fees from these firms or professionals.

Except for the receipt of Research and Soft Dollar Benefits described under Item 12 – Brokerage Practices, we do not receive any other compensation from outside parties in connection with the investment advice we provide to you.

Recommendation of Other Advisors

We may recommend that you use a sub-adviser as part of your asset allocation and investment strategy. The compensation arrangement is designed so that the sub-advisor fee is included with your Pathfinder Planning fee to prevent a conflict of interest. You are not required to use the services of any sub-adviser we recommend.

Item 15 – Custody

Under Federal and State regulations, registered investment advisers who are authorized to debit advisory fees from client accounts are considered to have custody. Schwab/TD Ameritrade and Betterment for Advisors maintain actual custody of your assets and forward advisory fees to Pathfinder Planning. Your statements will be available for you to review on each custodian's website. You will also receive electronic account statements directly from Schwab/TD Ameritrade and Betterment for Advisors. You should promptly review your statements.

Item 16 – Investment Discretion

Pathfinder Planning LLC offers Investment Management Services on a discretionary basis. Clients must grant discretionary authority in the executed investment advisory contract. Discretionary authority extends to the type and amount of securities to be bought and sold and does not require advance client approval. However, apart from the ability to request the deduction of advisory fees, Pathfinder Planning LLC does not have the ability to withdraw funds or securities from the client's account.

If you wish, you may limit our discretionary authority in some areas. For example, you may set a limit on the type of securities that can be purchased for your account. This information will be stated in the Investment Policy Statement we will complete with each account Investment Management Agreement. Please refer to Item 4 - Advisory Business, for more information on our discretionary management services.

Item 17 – Voting Client Securities

Pathfinder Planning LLC does not vote client proxy requests. Proxy voting information is sent directly from your broker-dealer or custodian. If you are interested in advice on how to vote a proxy, you may contact the company for a consultation. The standard hourly rate will apply.

Item 18 – Financial Information

Pathfinder Planning LLC is required to disclose information about the company's financial condition. The company has no financial issues that impact its ability to work for you. Neither the company nor its officers or management has filed for bankruptcy.

Item 19 - Requirements for State-Registered Advisers

Principal Executive Officers and Management Persons

Please refer to Item 2 of the Form ADV Part 2B Supplement for information about our Principal Executive Officer and Management's education and business background.

The officers and management of Pathfinder Planning LLC do not receive performance-based fees.

There are no arbitration cases, civil proceedings, self-regulatory organization proceedings, or administrative proceedings against an officer or manager of the company.

Pathfinder Planning LLC employees who give financial advice to Clients must have a college degree and relevant financial planning and/or investment advisory experience. Employees agree to adhere to the CFP® Board's Code of Ethics and Professional Responsibility, whether they are a CFP® certificant or not. Our company and our related persons do not have relationships or arrangements with any securities issuer.

Item 1 – Cover Page



Pamela J. Horack, CFP® 8 Mischief Lane, Lake Wylie, SC 29710 704.301.7522 www.pathfinderplanningllc.com September 30, 2024

This Brochure provides information about the qualifications and business practices of Pamela J. Horack, CFP® that supplements Pathfinder Planning LLC's brochure. You should have received a copy of that brochure. If you have any questions about the contents of this Brochure, please contact us at 704.301.7522 or info@pathfinderplanningllc.com.

Information about Pamela J. Horack, CFP[®] is available on the SEC's website at <u>www.adviserinfo.sec.gov</u>.

Item 2 – Educational Background and Business Experience

Name:	Pamela J. Horack, CFP®	
Birth Year:	1968	
Education:	Boston University, Certificate in Financial Planning (2014)	
	University of South Carolina, BS in Business Administration, Finance Major (1991)	

Experience:

Pathfinder Planning LLC, Lake Wylie, SC	DLJDirect, Charlotte, NC
President, Financial Planner	Online Brokerage Firm
(2010 – present)	Training Manager
	(1998 - 2001)
Mother, Lake Wylie, SC	Gates/Arrow, Greenville, SC
Caregiver for two boys	Computer Distributor
(2004 – forever)	Leasing Coordinator
	(1997 – 1998)
Bank of America Investment Services Inc.,	First Citizens Bank, Greenville, SC
Charlotte NC	Consumer Bank
Broker-Dealer	Branch Manager
Vice President - Curriculum Developer	(1996 - 1997)
(2002 – 2005)	
Atlantic Assurance, Charlotte, NC	Summit National Bank, Greenville, SC
Title, Appraisal, and Insurance Company	Consumer Bank
Training Manager	Teller, Customer Service Representative, Loan
(2001 - 2002)	Processor, Loan Documentation Specialist
	(1992 – 1996)

Certified Financial Planner™ Credentials:

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 68,000 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 over a six-hour 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.

Item 3 – Disciplinary Information

There are no arbitration cases, civil proceedings, self-regulatory organization proceedings, or administrative proceedings against Pamela J. Horack, CFP[®].

Item 4 - Other Business Activities

Pamela J. Horack, CFP[®] is not involved in any other investment related business activities. SMARTER Budgeting and Your Financial Mom activities are wholly owned subsidiaries of Pathfinder Planning LLC.

Item 5 - Additional Compensation

Please refer to Item 14 of our Form ADV Part 2A Brochure for more information about additional compensation received by our company and Mrs. Horack.

Item 6 – Supervision

Pamela J. Horack, CFP[®] is subject to the company's Policies and Procedures. The company is based in and regulated by the State of South Carolina and follows the rules and regulations of the state.

Item 7 - Requirements for State-Registered Advisers

There are no arbitration cases, civil proceedings, self-regulatory organization proceedings, or administrative proceedings against Pamela J. Horack, CFP®. She has not filed for bankruptcy in any state.

Item 1 – Cover Page



Aaron M. Salmon, CFP® 8 Mischief Lane, Lake Wylie, SC 29710 704.301.7522 www.pathfinderplanningllc.com September 30, 2024

This Brochure provides information about the qualifications and business practices of Aaron M. Salmon, CFP[®] that supplements Pathfinder Planning LLC's brochure. You should have received a copy of that brochure. If you have any questions about the contents of this Brochure, please contact us at 704.301.7522 or <u>info@pathfinderplanningllc.com</u>.

Information about Aaron M. Salmon, CFP[®] is available on the SEC's website at <u>www.adviserinfo.sec.gov</u>.

Item 2 – Educational Background and Business Experience

Name:	Aaron M. Salmon, CFP®		
Birth Year:	1974		
Education:	Presbyterian College, B.S. Business Administration (1996)		
	Graduate, Southeastern Trust School at Campbell University (2004)		
	Queens University, Certificate in Financial Planning (2005)		
Experience:			
Pathfinder Planning LLC, Lake Wylie, SC		Wachovia/Wells Fargo Wealth Management	
Investment Adviser Representative		Personal Trust Administrator	
(2017 – present)		(2002 – 2009)	
Stay-at-home	Dad		
(2009-Present)			

Certified Financial Planner™ Credentials:

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 68,000 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 over a six-hour 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.

Item 3 – Disciplinary Information

There are no arbitration cases, civil proceedings, self-regulatory organization proceedings, or administrative proceedings against Aaron M. Salmon, CFP[®].

Item 4 – Other Business Activities

Aaron M. Salmon, CFP® is not involved in any other investment related business activities.

Item 5 – Additional Compensation

Aaron M. Salmon, CFP[®] does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through Pathfinder Planning LLC.

Item 6 - Supervision

As a representative of Pathfinder Planning LLC, Mr. Salmon works closely with his supervisor who reviews all advice provided to clients prior to implementation. Pathfinder Planning implements procedures to ensure employees comply with the firm's Code of Ethics, and monitors all reports provided to clients. Questions can be referred to 704.301.7522 or info@pathfinderplanningllc.com.

Item 7 - Requirements for State-Registered Advisers

There are no arbitration cases, civil proceedings, self-regulatory organization proceedings, or administrative proceedings against Aaron M. Salmon, CFP®. Mr. Salmon has not filed for bankruptcy for bankruptcy in any state.