Gen Y Planning LLC

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Austin, TX 78701

Form ADV Part 2A – Firm Brochure

(612) 790-7955

www.genyplanning.com

Dated March 20, 2025

This brochure provides information about the qualifications and business practices of Gen Y Planning LLC. If you have any questions about the content of this firm brochure, please contact Ms. Sophia Daigle at (612) 790-7955.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or any state securities administrator. Additional information about Gen Y Planning LLC is available on the SEC's website at www.adviserinfo.sec.gov. Click on the "Investment Adviser Search" link and then search for "Investment Adviser Firm" using the firm's IARD number, which is 167656.

While the firm and its associates may be registered and/or licensed within a particular jurisdiction, that registration and/or licensing in itself does not imply an endorsement by any regulatory authority, nor does it imply a certain level of skill or training on the part of the firm or its associated personnel.

Item 2: Material Changes

Since the last annual amendment filing of this Form ADV Part 2, dated February 8, 2024, the following material change has occurred:

- Item 5: Our Portfolio Management Services fees have been updated.

The firm may at any time update this document and either send a copy of its updated brochure or provide a summary of material changes to its brochure and an offer to send an electronic or hard copy form of the updated brochure. Clients are also able to download this brochure from the SEC's website at www.adviserinfo.sec.gov or may contact our firm at (612) 790-7955 to request a copy at any time.

As with all firm documents, clients and prospective clients are encouraged to review this brochure in its entirety and are encouraged to ask questions at any time prior to or throughout the engagement.

Item 3: Table of Contents

Contents

Item 4: Advisory Business

Description of Advisory Firm

Gen Y Planning LLC is a Texas limited liability company formed originally formed in 2013. We may operate under the trade name Gen Y Planning. We are not a subsidiary of, nor do we control another financial services industry entity. Our original registration occurred in 2013 as an investment advisor with the State of Minnesota, and our firm and its associates may register or meet certain exemptions to registration and/or licensing in other jurisdictions in which we conduct investment advisory business. As of February 2023, Gen Y Planning LLC is registered in the following states: California, Florida, Illinois, Massachusetts, Minnesota, New Jersey, New York, Pennsylvania, Texas and Washington.

Ms. Sophia B. Daigle, CFP® is the firm's Founder, Managing Member and Chief Compliance Officer (supervisor), as well as the majority unitholder (shareholder). Additional information about Sophia B. Daigle may be found in the accompanying Form ADV Part 2B brochure supplement.

Descriptions of Advisory Services Offered

Portfolio Management Services

We are in the business of managing individually tailored investment portfolios. Our firm provides continuous advice to a client regarding the investment of client funds based on the individual needs of the client. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, we develop a client's personal investment policy or an investment plan with an asset allocation target and create and manage a portfolio based on that policy and allocation target, on a discretionary basis. During our data-gathering process, we determine the client's individual objectives, time horizons, risk tolerance, and liquidity needs. We may also review and discuss a client's prior investment history, as well as family composition and background.

Third-Party Advisers

We offer investment advisory services through use of Betterment, LLC, CRD #149117, "Betterment") for portfolio management services. We assist clients in selecting an appropriate allocation model, completing Betterment's investor profile questionnaire, interacting with Betterment and reviewing Betterment. Additionally, we will meet with the client on a periodic basis to discuss changes in their personal or financial situation, suitability, and any new or revised restrictions to be applied to the account. Fees pertaining to this service are outlined in Item 5 of this brochure.

We will serve as the communication conduit between the client and Betterment. We shall be available to answer questions that the clients may have regarding their account. Prior to the introduction of a prospective client to Betterment, we collect financial and demographic information, and will assist the client in identifying their financial objectives. We will also keep the client's financial plan current to meet the ongoing needs of the client.

Should you choose not to place your assets with Betterment, Gen Y and its advisors will be unable to manage your portfolio account. However, Gen Y will be able to offer you our Investment Management Consultation service. Additionally, please note, Client may go directly to Betterment for investment management services, outside of the advisory services provided by Gen Y.

Client should obtain and read Betterment's Disclosure Brochure (ADV Part 2) for a complete description of their service, fee schedules and account minimums. A Disclosure Brochure will be provided to clients at the time an agreement for services is executed and account is established.

Financial Planning and Investment Consultation Services

Additionally, Gen Y Planning provides a broad range of financial planning solutions to its clients. For those interested in areas such as: cash flow and budgeting, education funding, retirement planning, risk management, estate planning, tax planning, as well as periodic investment advice, we offer our *financial planning and investment consultation services*.

Financial planning and investment consultation services may be as broad-based or narrowly focused as you desire. The incorporation of most or all of the listed components allows not only a more thorough analysis but also an in-depth view of your plans to assist you in reaching your goals and objectives.

Cash Flow and Debt Management

A review of your income and expenses will be conducted to determine your current surplus or deficit along with advice on prioritizing how any surplus should be used, or how to reduce expenses if they exceed your income. Advice may also be provided on which debts to pay off first based on factors such as the interest rate of the debt and any income tax ramifications. Recommendations may also be made with respect to appropriate cash reserves for emergencies and other financial goals, and a review of accounts (such as money market funds) for such reserves, plus strategies to save desired amounts.

Risk Management

A risk management review includes an analysis of your exposure to major risks that could have a significant adverse impact on your financial picture, such as premature death, disability, property and casualty losses, or the need for long-term care planning. Advice may be provided on ways to minimize such risks and about weighing the costs of purchasing insurance versus the benefits of doing so and, likewise, the potential cost of not purchasing insurance ("self-insuring").

Employee Benefits

We will provide review and analysis as to whether you, as an employee, are taking the maximum advantage possible in your employee benefit programs. If you are a business owner, we will consider and/or recommend the various benefit programs that can be structured to meet both business and personal retirement goals.

Retirement Planning

Retirement planning services typically include projections depicting the likelihood of achieving your financial goals, with financial independence usually the primary objective. For situations where projections show less than the desired results, a recommendation may include showing you the impact on those projections by making changes in certain variables (i.e., working longer, saving more, spending less, taking more risk with investments). If you are near retirement or already retired, advice may be given on appropriate distribution strategies to minimize the likelihood of running out of money or having to adversely alter spending during your retirement years.

Tax Planning Strategies
Advice may include ways to minimize current and future income taxes as a part of your overall financial planning picture. For example, we may make recommendations on which type of account(s) or specific investments should be owned based in part on their “tax efficiency,” with consideration that there is always a possibility of future changes to federal, state or local tax laws and rates that may impact your situation.

We recommend that you consult with a qualified tax professional before initiating any tax planning strategy, and we may provide you with contact information for accountants or attorneys who specialize in this area if you wish to hire someone for such purposes. From time to time, we will participate in meetings or phone calls between you and your tax professional with your approval or request.

Education Planning
College funding advice may include projecting the amount that will be needed to achieve post-secondary education funding goals, along with savings strategies and the “pros-and-cons” of various college savings vehicles that are available.

Estate Planning
Review and advice usually involve an analysis of your exposure to estate taxes and your current estate plan; determining whether you have a will, financial and health care powers of attorney, trusts and other related documents. Our advice also typically includes ways for you to minimize or avoid future estate taxes by implementing appropriate estate planning strategies such as the use of applicable trusts.

We recommend that you consult with a qualified attorney when you initiate, update, or complete estate planning activities. We may provide you with contact information for attorneys who specialize in estate planning when you wish to hire someone for such purposes. From time-to-time, we will participate in meetings or phone calls between you and your attorney with your approval or request.

Investment Consultation
Our investment consultation services may involve providing information on the types of investment vehicles available, employee retirement plans and/or stock options, investment analysis and strategies, asset selection and portfolio design, as well as assisting you with your investment account if it is maintained at another broker/dealer or custodian. The strategies and types of investments we may recommend are further discussed in Item 8 of this brochure.

Periodic Review
We strongly urge our clients to notify us of any change in their circumstances, and to schedule a review any time there is such a change. An annual review should be considered even if there is not a substantial change, because tax laws, estate laws, and investment vehicles are always changing. Additional information may be found in Item 13 of this brochure.

Broad-Based v. Modular Financial Planning
A broad-based plan is an endeavor that requires detail, therefore, certain variables can affect the cost involved in the development of the plan: the quality of your own records, complexity and number of current investments, diversity of insurance products and employee benefits you currently hold, size of the potential estate, and special needs of the client or their dependents, among others.

While certain broad-based plans may require 10 or more hours to complete, complex plans may require more than 20 hours. Alternatively, we may concentrate on reviewing only a specific area (modular planning), such as college funding, a portfolio allocation, divorce planning issue, or evaluating the sufficiency of your retirement plan. Note that when these services focus only on certain areas of your interest or need, your overall situation or needs may not be fully addressed due to limitations you may have established. In all instances involving our financial planning and investment consultation services, our clients retain full discretion over all implementation decisions and are free to accept or reject any recommendation we make.

Whether we have created a broad-based or modular plan, we will present you with a summary of our recommendations, guide you in the implementation of some or all of them per your decision, as well as offer you periodic reviews thereafter.

Clients have the option to purchase investment products, that have been recommended by Gen Y Planning LLC, through other brokers or agents, who are not affiliated with Gen Y Planning LLC.

Engagement with Gen Y Planning

During or prior to your first meeting with our firm you will be provided with a current Form ADV Part 2 firm brochure that includes a statement with regard to our privacy policy (found in Item 11). We will also ensure that we disclose any material conflicts of interest that could be reasonably expected to impair the rendering of unbiased and objective advice.

New clients, as defined as not having previously engaged Gen Y for services, may request a no cost 30-minute consultation. When engaging Gen Y Planning for its advisory services, you must first enter into a written agreement with our firm. Thereafter, discussion and analysis will be conducted to determine your financial needs, goals, holdings, etc. Depending on the scope of the engagement, you may be asked to provide current copies of the following documents early in the process:

<table>
<tr><td>• Wills, codicils and trusts
• Divorce decree
• Insurance policies
• Investment objectives
• Investment experience
• Risk tolerance
• Liquidity (cash flow) needs</td><td>• Tax Status:
○ Type of account (natural person, entity, IRA, etc.)
○ Tax bracket
○ Tax strategy for the account(s)</td><td>• Liabilities
○ Auto, home loans, HELOCs
○ Mortgage information
○ Credit card balances and interest rates
○ Student loan documents</td></tr>
<tr><td colspan="3">• Employment Status
○ Business agreements you may have in place
○ Information on retirement plans and benefits provided by your employer
○ Statements reflecting current investments in retirement and non-retirement accounts
○ Financial data that may include tax returns, W-2s or 1099s and/or paystubs</td></tr>
<tr><td colspan="3">• Financial Situation and needs:
○ Annual income
○ Total net worth (excluding primary residence)
○ Liquid net worth
○ Employment status (if retired, former profession. If self-employed, type of business)
○ Fair market value of primary residence</td></tr>
</table>

* Completed risk profile questionnaires or other forms provided by our firm

It is important that the information and/or financial statements you provide are accurate. Our firm may, but is not obligated to, verify the information you have provided, which will then be used in the investment advisory process. It is also necessary that you provide us with an adequate level of information and supporting documentation throughout the term of the engagement including, but not limited to: source of funds, income levels, and an account holder or their legal agent's authority to act on behalf of the account, among other information. This helps us determine the appropriateness of our planning and/or investment strategies for your portfolio. It is also very important that you keep us informed of significant changes that may call for an update to your investment plans. Events such as changes in employment or marital status, an unplanned windfall, etc., can have an impact on your circumstances and needs. We need to be aware of such events, so that we may make adjustments as necessary in order to keep you on track toward your goals.

Client Tailored Services and Client Imposed Restrictions

We will account for any reasonable restrictions you may require for the management of your investment account(s). Clients may request restrictions, in writing. While we will strive to document and annually update client suitability information, it does remain your responsibility to promptly notify us, in writing, if there is any change in your financial situation and/or investment objectives for the purpose of our reviewing, evaluating or revising previous account restrictions or firm investment recommendations.

Wrap Fee Programs

Our firm does not sponsor or serve as a portfolio manager in an investment program involving wrapped fees.

Client Assets Under Management

As of December 31, 2024, our firm had $36,726,693 of reportable client assets under our management via discretionary engagements and $0.00 on a non-discretionary engagement.

General Information

Gen Y Planning does not provide legal, accounting or insurance services. With your consent, we may work with other professional advisors, such as an accountant, attorney or insurance representative to assist with coordination and implementation of accepted strategies. You should be aware that these other entities will charge you separately for their services and these fees will be in addition to our own advisory fee.

Our firm will use its best judgment and consistent with Adviser's fiduciary duty in rendering its services. Gen Y Planning cannot warrant or guarantee the achievement of a planning goal or any particular level of account performance or that your account will be profitable over time. Past performance is not necessarily indicative of future results. Nothing in this Brochure may be interpreted to limit or modify the investment adviser's fiduciary duties to its clients.

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

Federal and state securities laws impose liabilities under certain circumstances on persons who act in good faith and, therefore, nothing contained in this document, or our client engagement agreement shall constitute a waiver of any rights that a client may have under federal and state securities laws. Information disclosed in this brochure should not be interpreted to limit or modify the investment adviser's fiduciary duties to its clients.

Item 5: Fees and Compensation

Forms of payment are based on the types of services being provided, term of service, etc., and will be stated in your engagement agreement with the firm. Payment is made via check or draft from a U.S. financial institution as well as through qualified, unaffiliated third-party processors which requires your prior authorization, or by Betterment for portfolio management clients. Advisory fee deduction by Betterment requires your prior written authorization. In all instances, we will send you a written invoice, including the fee, the formula used to calculate the fee, the fee calculation itself, the time period covered by the fee, and, if applicable, the amount of assets under management on which the fee was based. Also, we will include the name of the custodian(s) on your fee invoice. We will send these to you concurrent with the request for payment or payment of our advisory fees. We urge you to compare this information with the fees listed in the account statement. We do not accept cash, money orders or similar forms of payment for advisory engagements. Per annum interest at the current statutory rate may be assessed on fee balances due more than 30 days.

Portfolio Management Services Fee

Portfolio management services accounts are assessed an annualized asset-based fee that is based on the average daily balance during the calendar quarter. Using an average daily balance allows our firm to readily adjust for additions and withdrawals, as well as mid-cycle account openings or closures. We bill on a quarterly basis, in arrears, per the following table:

Assets Under Management	Annualized Asset-Based Fee*	Quarterly Asset-Based Fee
$0 - $999,999	0.86% (86 basis points)	0.215% (21.5 basis points)
$1,000,000 - $1,999,999	0.61% (61 basis points)	0.152% (15.25 basis points)
$2,000,000 and Above	0.51% (51 basis points)	0.127% (12.75 basis points)

* The above Annualized Asset Based Fee excludes Betterment's fee which is a maximum of 0.14%. The maximum asset-based fee assessed would therefore be 1.00% (1,000 basis points), except if a client wants to invest in one of Betterment's crypto portfolios, Betterment charges a 1% platform fee for those portfolios, which is in addition to our fee.

The above portfolio management services fees are in addition to a client's financial planning fees. Account asset values are in consonance with the statement you receive from your custodian of record for the purpose of verifying the computation of our advisory fee. Our fees are not negotiable.

We aggregate portfolio management services accounts for the same individual or two or more accounts within the same family, or accounts where a family member has power of attorney over another family member or incompetent person's account. Should investment objectives be substantially different for any two or more household accounts, requiring different investment approaches or operational requirements, we reserve the right to apply our fee schedule separately to each account.

Your first billing cycle will begin once your agreement is executed with our firm. Fees for partial billing periods, the fees will be calculated based upon the number of days the account was open during that billing period. Fee payments will generally be assessed within the first 10 days of the following month.

All fees deducted by Betterment will be clearly noted on account statements that you will receive directly from the custodian of record on a quarterly basis. Clients are urged to carefully review and compare account statements that they have received directly from their custodian of record with any document they may receive from our firm, or any other party should the report contain portfolio performance information.

By signing Betterment's agreement, as well as the account opening documents, you will be authorizing the withdrawal of both advisory and transactional fees (see following section) from your account. The withdrawal of these fees will be accomplished by the selected custodian, not by our firm, and the custodian will remit our fees directly to our firm.

Financial Planning Fixed Fee

Our services typically begin via a financial planning engagement so that each of our clients has a foundation: a personalized plan that includes stated goals and objectives. This service is offered on a fixed fee basis ranging from $4,800 to $12,000 per plan, depending on your project, your financial profile and services to be rendered. Additionally, this service requires a 12-month contract, with a setup fee ranging from $2,000-$4,000, followed by an annual fee, which is paid monthly.

All fees are non-negotiable and is due upon engagement, however, we will not bill an amount above $500.00 6 months or more in advance of the delivery of the financial plan to the client. In the event of early termination, the client will be billed for the hours worked at a rate of $300.00 per hour for Sophia Daigle, and the client will be refunded the difference.

Gen Y will assess an ongoing monthly fee ranging from $400.00 to $1,000.00 which is paid in advance each month. We require the first month's fee to be paid upon engagement. If no service is provided to the client during the first month, the unearned fees will be refunded to the client and the client will not be charged for the month.

Payment is made through a third-party payment processor such as Quickbooks Online (Intuit Payment Network) and/or PayPal. For clients enrolled in this ongoing service, they will receive:

- **60 Minute Initial Discovery Meeting** via video conferencing, where we talk more in depth about your financial goals and most pressing financial concerns.
- **60 Minute Recommendations Meeting**, which includes:
  - An easy-to-read summary of your current net worth, goals, action items, and more.
  - Recommendations in the following areas: savings targets, debt repayment, investment goals, retirement planning, insurance, estate planning, and tax planning.
  - An asset allocation for your current 401(k) or work retirement plan.
  - A recommendation of the credit card that fits your needs based on your spending.
  - Connections via email to experts in our network (CPAs, estate planning attorneys, insurance agents).
- **60-Minute follow-up meetings every 4-6 months**, or as a major life event comes up, to check your progress.
- **Unlimited email support**

Fees for our planning services and ongoing support take into consideration factors such as the complexity of your financial profile; the time involved developing your plan and assisting you in its execution, assets that comprise your overall portfolio, as well as the number of individual accounts comprising the portfolio.

Washington Residents

For Washington residents, the annual fee will not exceed 2% of assets under management. If the calculated fee does exceed 2% AUM, then:

1. If the fee exceeds 2% of AUM from the onset of the client engagement, then we will track tasks and hours and earn the fees based on hours worked, based on an hourly rate of $300.00 per hour for Sophia Daigle.
2. If the flat fee does not exceed 2% of AUM to begin with but, because of changes to the portfolio, it now does, we will either lower the fee to be below 2% or justify the fee based on hours, as above described.

We will calculate % of AUM every 3 months to ensure fees don't exceed 2%.

For clients whose fee we justify by hours worked:

1. Every 6 months, we issue an invoice that outlines all the tasks and associated hours for the previous 6 months.
2. At that point, we reconcile the fees earned with the fees paid.
    a. If fees paid exceed fees earned, we issue a refund for the excess.
    b. If fees earned exceed fees paid, the unpaid fees will be included in the next 6-month cycle.

Financial Planning Hourly Fee

On a limited basis, we may be engaged for our financial planning and investment consultation services on an hourly fee basis. This is typically for those clients requiring a narrowly focused plan, incidental advice or abbreviated review session. The hourly rate is $300.00 per hour for Sophia Daigle, that will be billed in 15-minute increments, and a partial increment will be treated as a whole increment. Prior to engagement you will receive an estimate of the overall cost based on your requirements and the time involved. The fee is due at the completion of the engagement. In the event of early termination by client, any fees for the hours already worked will be due.

Discounting Fees

The services to be provided to you and their specific fees will be detailed in your engagement agreement. We strive to offer fees that are fair and reasonable in light of the experience of the firm and the services to be rendered to our clients, however, similar services may be made available from other providers and potentially at a lower fee.

Additional Client Fees

Certain transactional or service fees (sometimes termed *brokerage fees*) assessed by a custodian, individual retirement account fees, qualified retirement plan or account termination fees, wire transfer fees may be borne by the account holder and are per those provided in current, separate fee schedule of the custodian of record. We will ensure you receive a copy of the custodian's fee schedule at the beginning of the engagement, and you will be notified of any future changes to these fees by the custodian of record and/or third-party administrator for certain tax-qualified plans. Fees paid by our clients to our firm for our advisory services are separate from any of these fees or other similar charges.

Fees paid by our clients to our firm for our advisory services are separate from any transactional charges a client may pay, as well as those internal management and administrative fees for mutual funds, exchange-traded funds (ETFs), index mutual funds or other investments of this type. Payments can be made through a third-party payment processor such as Quickbooks Online (Intuit Payment Network) and/or PayPal. The client will be able to securely input their banking information and pay the advisory fee through their own secure portal and that we will not have continuous access to the client's banking information. We also accept checks. We do not accept cash, money orders or similar forms of payments.

Per annum interest at the current statutory rate may be assessed on fee balances due more than 30 days; we may refer past due accounts to collections or legal counsel for processing. We reserve the right to suspend some or all services once an account is deemed past due.

Additional information, about our fees in relationship to our business practices, are noted in Item 12 and Item 14 of this document.

External Compensation for the Sale of Securities to Clients

We do not charge or receive a commission or mark-up on your securities transactions, nor will the firm or an associate be paid a commission on your purchase of a securities holding or insurance contract that we recommend to you. Clients have the option to purchase investment products which we have recommended to you, through other brokers or agents not affiliated with our firm.

We do not receive "trailer" or SEC Rule 12b-1 fees from an investment company we may recommend for your portfolio. Fees charged by issuers are detailed in prospectuses or product descriptions and you are encouraged to read these documents before investing. Our firm and its associates receive none of these described or similar fees or charges.

You will always have the option to purchase recommended or similar investments through your own selected service provider.

Charged Prepayment of Client Fees

Advance Payment for Certain Services

As stated in your agreement with our firm, we may require advance payment under the following engagements:

- a set-up fee ranging from $2,000 to $4,000 is assessed to begin our financial planning engagement.
- monthly fixed fee ranging from $400 to $1,000 per month for ongoing financial planning and investment consultation services.

Please note that if no service is provided to the client, or the service that is provided does not meet the required hourly threshold based on the hourly financial planning service, the amount due will be reduced according to the service that was completed and any unearned fee will be refunded to the client. If no service is provided to the client, the unearned fees will be refunded to the client and the client will not be charged during that period.

Termination of Services

If our Form ADV Part 2 brochure was not delivered to you at least 48 hours prior to entering into the investment advisory contract with our firm, then you have the right to terminate the engagement without fee and penalty within five business days after entering into the agreement.

Either party may terminate the agreement at any time by written notice, via email or letter, to the other party. If you verbally, either a phone call or in person, notify our firm of the termination and, if in two business days following this notification, we have not received your notice in writing, we will make a written notice of the termination in our records and send you our own termination notice as a substitute. Our firm will not be responsible for future allocations, investment advice or transactional services upon receipt of a termination notice. Upon termination, it will also be necessary that we inform the custodian of record that the relationship between the firm and the client has been terminated.

Should you terminate a financial planning engagement with us after this time period, you may be assessed a fee based upon the hourly rate of the investment advisor representative with whom services were provided or for any time that may have been incurred by our firm in the preparation of your analysis or plan.

For portfolio management services engagements, should you terminate the agreement after the five-day period, you will be assessed fees on a prorated basis for services incurred from either (*i*) as a new client, the date of the engagement to the date of the firm's receipt of the written notice of termination; or (*ii*) all other accounts, the last billing period to the date of the firm's physical or constructive receipt of written termination notice. As mentioned previously, either party may terminate the agreement at any time by written notice, via email or letter, to the other party. If termination is given by verbal notice, the date of which the verbal notice was made would be the effective termination date.

Earned fees in excess of any prepaid deposit will be billed at the time of termination and will be due upon receipt of our invoice. We will return any prepaid, unearned advisory fees within 30 days of our receipt of a termination notice. This will only be provided via check from a US-based financial institution; no credits or "transaction reversals" will be issued to an account.

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

Gen Y Planning's advisory fees will not be based on a share of capital gains or capital appreciation (growth) of any portion of managed funds, also known as performance-based fees, and therefore we do not engage in side-by-side management.

Item 7: Types of Clients

While our current client-base consists of individual investors, we are also available to families, their trusts and estates, as well as pension and profit-sharing plans. We encourage interested parties of all economic levels to seek our advisory services. We do not require minimum income, minimum asset levels or other similar preconditions. Gen Y Planning reserves the right to waive or reduce certain fees based on unique individual circumstances, special arrangements, or preexisting relationships. We also reserve the right to decline services to any prospective client for any non-discriminatory reason.

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

Methods of Analysis and Investment Strategies

Method of Analysis

For all of our advisory services, we will first gather and consider several factors, including your:

- current financial situation
- current and long-term needs
- investment goals and objectives
- level of investment knowledge
- tolerance or appetite for risk
- reasonable investment restrictions involving your account(s)

Our research is drawn from sources that include financial periodicals, reports from economists and other industry professionals, annual reports as well as prospectuses and other regulatory filings.

Investment Strategies

We recognize that each client's needs and goals are different; subsequently portfolio strategies and underlying investment vehicles may vary. Generally, our investment advice is based on *Modern Portfolio Theory* and the belief that proper diversification and risk management will provide an investor client with a stable and consistent return over time. The practice of Modern Portfolio Theory does not employ market timing or stock selection methods of investing but rather a long-term buy-and-hold strategy with periodic rebalancing of the account to maintain desired risk levels. We employ a passive (or index) investing strategy, in accordance with *Modern Portfolio Theory*.

Investment Vehicles Generally Recommended

We typically recommend portfolios that contain investment vehicles considered diversified, tax-efficient and low-cost whenever practical. It would be common to find a broad range of no-load and/or no transaction fee mutual funds, ETFs, and other mutual funds within a portfolio that we have designed. We may also recommend an investor retain pre-existing holdings when appropriate.

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

Investment Strategy and Method of Analysis Material Risks

The firm believes its strategies and investment recommendations are designed to produce the appropriate potential return for the given level of risk. We cannot guarantee that an investment objective or planning goal will be achieved. Investing in securities involves risk of loss that clients should be prepared to bear.

Examples of risk include:

Company Risk

When investing in securities, such as stocks, there is always a certain level of company or industry-specific risk that is inherent in each company or issuer. There is the risk that the company will perform poorly or have its value reduced based on factors specific to the company or its industry. This is also referred to as *unsystematic risk* and can be reduced or mitigated through appropriate diversification.

Failure to Implement

As a financial planning client, you always have the right to accept or reject any or all of the recommendations made to you. While no advisory firm can guarantee future performance, no plan can succeed if it is not implemented. Clients who choose not to take the steps recommended in their financial plan may face an increased risk that their stated goals and objectives will not be achieved.

Financial Risk

Excessive borrowing to finance a business operation increases profitability risk because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Inflation Risk

When any type of inflation is present, a dollar today will not buy as much as a dollar next year because purchasing power is eroding at the rate of inflation.

Market Risk

When the stock market as a whole or an industry as a whole fails, it can cause the prices of individual stocks to fall indiscriminately. This is also called *systemic* or *systematic* risk.

Passive Markets Theory

A portfolio that employs a passive, efficient markets approach (representative of Modern Portfolio Theory) has the potential risk at times to generate lower-than-expected returns for the broader allocation than might be the case for a more narrowly focused asset class, and the return on each type of asset may be a deviation from the average return for the asset class. We believe this variance from the "expected return" is generally low under normal market conditions when a portfolio is made up of diverse, low or non-correlated assets.

Research Data

When research and analyses are based on commercially available software, rating services, general market and financial information, or due diligence reviews, a firm is relying on the accuracy and validity of the information or capabilities provided by selected vendors, rating services, market data, and the issuers themselves. While our firm makes every effort to determine the accuracy of the information received, we cannot predict the outcome of events or actions taken or not taken, or the validity of all information researched or provided which may or may not affect the advice on or investment management of an account.

Socially Conscious Investing

If you require your portfolio to be invested according to socially conscious principles, you should note that returns on investments of this type may be limited and because of this limitation you may not be able to be as well diversified among various asset classes. The number of publicly traded companies that meet socially conscious investment parameters is also limited, and due to this limitation, there is a probability of similarity or overlap of holdings, especially among socially conscious mutual funds or ETFs. Therefore, there could be a more pronounced positive or negative impact on a socially conscious portfolio, which could be more volatile than a fully diversified portfolio.

Security-Specific Material Risks

Exchange Traded Fund Risks

When a client invests in an ETF, the client indirectly bears its proportionate share of any fees and expenses payable directly by the fund. 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. We do not recommend leveraged or inverse ETFs due to their inherent heightened risk.

Cryptocurrency Risks

Cryptocurrency is any form of virtual currency that uses a decentralized ledger to record transactions and manage the issuance of new units. Cryptocurrency is part of an emerging marketplace and is highly speculative. Investing in cryptocurrency is for investors who can bear the economic risk of loss of their investments. As with all investments, past performance or price movements are not guarantees of future price movements. Cryptocurrency investing is volatile and involves a high degree of risk. Risks associated with investing in cryptocurrency include, but are not limited to, investment risk, volatility risk, liquidity risk, risks of disruption or interruption of access to your account, custody risk, regulatory risk, and cybersecurity breaches. Cryptocurrencies are not legal tender and not backed by the government. Legislation and regulation (or lack thereof) of cryptocurrency or crypto exchanges can change any time which may adversely affect the use, transfer, exchange, and/or value of cryptocurrencies. Once executed, a cryptocurrency transaction may be irreversible, and accordingly, losses due to fraudulent or accidental transactions may not be recoverable. Some cryptocurrency transactions shall be deemed to be made when recorded on a public ledger (e.g., a blockchain), which is not necessarily the date or time that the client initiates the transaction. The value of cryptocurrency may be derived from the continued willingness of market participants to exchange fiat currency for cryptocurrency, which may result in the potential for permanent and total loss of value of a particular cryptocurrency should the market for cryptocurrencies collapse. Cryptocurrency is a digital currency and therefore intangible. This means that, like any other digital system, cryptocurrencies are at risk of fraud, cyber-attacks, and being affected by technical problems or difficulties which could result in the client losing crypto assets or delaying or preventing the ability to access or use them. Clients should carefully consider their financial circumstances and risk tolerance before investing in cryptocurrency, as it is highly volatile and can quickly rise and fall dramatically. We strongly urge clients to carefully review the risks involved with cryptocurrencies prior to making an investment.

Fixed Income Risks

Various forms of fixed income instruments, such as bonds, money market or bond funds may be affected by various forms of risk, including:

Credit Risk

The potential risk that an issuer would be unable to pay scheduled interest or repay principal at maturity, sometimes referred to as "default risk." Credit risk may also occur when an issuer's ability to make payments of principal and interest when due is interrupted. This may result in a negative impact on all forms of debt instruments, as well as funds or ETF share values that hold these issues. Bondholders are creditors of an issuer and have priority to assets before equity holders (i.e., stockholders) when receiving a payout from liquidation or restructuring. When defaults occur due to bankruptcy, the type of bond held will determine seniority of payment.

Duration Risk

Duration is a measure of a bond's volatility, expressed in years to be repaid by its internal cash flow (interest payments). Bonds with longer durations carry more risk and have higher price volatility than bonds with shorter durations.

Interest Rate Risk

The risk that the value of the fixed income holding will decrease because of an increase in interest rates.

Liquidity Risk

The inability to readily buy or sell an investment for a price close to the true underlying value of the asset due to a lack of buyers or sellers. While certain types of fixed income are generally liquid (i.e., bonds), there are risks which may occur such as when an issue trading in any given period does not readily support buys and sells at an efficient price. Conversely, when trading volume is high, there is also a risk of not being able to purchase a particular issue at the desired price.

Reinvestment Risk

With declining interest rates, investors may have to reinvest interest income or principal at a lower rate.

Index Investing

You will need to keep in mind that investment vehicles such as certain ETFs and indexed funds have the potential to be affected by "tracking error risk" (see earlier paragraph under Core + Satellite Strategies).

QDI Ratios

While many ETFs and index mutual funds are known for their potential tax-efficiency and higher "qualified dividend income" (QDI) percentages, there are asset classes within these investment vehicles or holding periods within that may not benefit. Shorter holding periods, as well as commodities and currencies (that may be part of an ETF or mutual fund portfolio), may be considered "non-qualified" under certain tax code provisions. A holding's QDI will be considered when tax-efficiency is an important aspect of the client's portfolio.

Item 9: Disciplinary Information

Neither the firm nor its management has been involved in a material criminal or civil action in a domestic, foreign or military jurisdiction, an administrative enforcement action, or self -regulatory organization proceeding that would reflect poorly upon our offering advisory business or its integrity.

Please note, the disciplinary history of Gen Y and its representatives can be obtained from The Commonwealth of Massachusetts Securities Division at 617-727-3548 or msd@sec.state.ma.us.

Item 10: Other Financial Industry Activities and Affiliations

No Gen Y Planning employee is registered, or has an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

No Gen Y Planning employee is registered, or have an application pending to register, as a futures commission merchant, commodity pool operator or a commodity trading advisor.

Gen Y Planning only receives compensation directly from clients. We do not receive compensation from any outside source. We do not have any conflicts of interest with any outside party.

Recommendations or Selections of Other Investment Advisers

Gen Y Planning employs Betterment to manage client accounts and Sophia Daigle, Managing Member and CCO, owns stock in Betterment. This situation creates a conflict of interest. However, the client's best interest and suitability of Betterment will be the main determining factors of Gen Y Planning. This relationship is disclosed to the client at the commencement of the advisory relationship. These compensation arrangements present a conflict of interest because Gen Y Planning has a financial incentive to recommend the services of the other investment advisers. You are not obligated, contractually or otherwise, to use the services of any other investment advisers we recommend. Additionally, Gen Y Planning will only recommend another investment adviser who is properly licensed or registered as an investment adviser.

Disclosure of Material Conflicts

All material conflicts of interest under CCR Section 260.238(k) are disclosed regarding Gen Y Planning, its representatives or any of its employees, which could be reasonably expected to impair the rendering of unbiased and objective advice.

Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Gen Y Planning believes that its business methodologies, ethics rules and adopted policies are appropriate to mitigate material conflicts of interest and to appropriately manage any material conflicts of interest that may remain. Clients should be aware that no set of rules can possibly anticipate or relieve all potential material conflicts of interest. Our firm will disclose to its advisory clients any material conflict of interest relating to the firm, its representatives, or any of its employees which could reasonably be expected to impair the rendering of unbiased and objective advice.

Code of Ethics Description

The firm owes the client a *fiduciary* duty to put the client's interest first which includes, but is not limited to, a duty of care, loyalty, obedience, and utmost good faith. We have adopted a Code of Ethics that establishes policies for ethical conduct for our personnel. Our firm accepts the obligation not only to comply with all applicable laws and regulations but also to act in an ethical and professionally responsible manner in all professional services and activities. Firm policies include prohibitions against insider trading, circulation of industry rumors, and certain political contributions, among others. Gen Y Planning periodically reviews and amends its Code of Ethics to ensure that it remains current and requires firm personnel to annually attest to their understanding of and adherence to the firm's Code of Ethics. A copy of the firm's Code of Ethics is made available to any client or prospective client upon request.

CERTIFIED FINANCIAL PLANNER™ Professionals, such as Ms. Daigle, adhere to the Certified Financial Planner Board of Standards, Inc. principles, which state:

Principle 1 – Integrity
An advisor will provide professional services with integrity. Integrity demands honesty and candor which must not be subordinated to personal gain an advantage. Advisors are placed by clients in positions of trust, and the ultimate source of that trust is the advisor's personal integrity. Allowance can be made for innocent error and legitimate differences of opinion; but integrity cannot co-exist with deceit or subordination of one's principles.

Principle 2 – Objectivity
An advisor will provide professional services objectively. Objectivity requires intellectual honesty and impartiality. Regardless of the particular service rendered or the capacity in which an advisor functions, an advisor should protect the integrity of their work, maintain objectivity and avoid subordination of their judgment.

Principle 3 – Competence
Advisors will maintain the necessary knowledge and skill to provide professional services competently. Competence means attaining and maintaining an adequate level of knowledge and skill and applies that knowledge effectively in providing services to clients. Competence also includes the wisdom to recognize the limitations of that knowledge and when consultation with other professionals is appropriate or referral to other professionals necessary. Advisors make a continuing commitment to learning and professional improvement.

Principle 4 – Fairness
Advisors will be fair and reasonable in all professional relationships. Fairness requires impartiality, intellectual honesty and disclosure of material conflict(s) of interest. It involves a subordination of one's own feelings, prejudices and desires so as to achieve a proper balance of conflicting interests. Fairness is treating others in the same fashion that you would want to be treated and is an essential trait of any professional.

Principle 5 – Confidentiality
Advisors will protect the confidentiality of all client information. Confidentiality means ensuring that information is accessible only to those authorized to have access. A relationship of trust and confidence with the client can only be built upon the understanding that the client's information will remain confidential.

Principle 6 – Professionalism
Advisors will act in a manner that demonstrates exemplary professional conduct. Professionalism requires behaving with dignity and courtesy to all who use their services, fellow professionals, and those in related

professions. Advisors cooperate with fellow advisors to enhance and maintain the profession's public image and improve the quality of services.

Principle 7 – Diligence

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

Statement Involving Our Privacy Policy

We respect the privacy of all clients and prospective clients (collectively termed "customers"), both past and present. It is recognized that you have entrusted our firm with non-public personal information, and it is important that both access persons and customers are aware of firm policy concerning what may be done with that information.

The firm collects personal information about customers from the following sources:

- Information customers provide to complete their financial plan or investment recommendation.
- Information customers provide in engagement agreements and other documents completed in connection with the opening and maintenance of an account.
- Information customers provide verbally; and
- Information received from service providers, such as custodians, about customers' transactions.

The firm does not disclose non-public personal information about our customers to anyone, except in the following circumstances:

- When required to provide services, our customers have requested.
- When our customers have specifically authorized us to do so.
- When required during the course of a firm assessment (i.e., independent audit); or
- When permitted, or required by law (i.e., periodic regulatory examination).

Within the firm, access to customer information is restricted to personnel that need to know that information. All access persons and service providers understand that everything handled in firm offices are confidential and they are instructed not to discuss customer information with someone else that may request information about an account unless they are specifically authorized in writing by the customer to do so. This includes providing information about a spouse's IRA or a parent's account.

To ensure security and confidentiality, the firm maintains physical, electronic, and procedural safeguards to protect the privacy of customer information.

The firm will provide our customers with its privacy policy on a cyclical basis per regulatory guidelines and at any time, in advance, if firm privacy policies are expected to change.

Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest

Neither the firm nor an associate is authorized to recommend to a client, or effect a transaction for a client, involving any security in which the firm or a "related person" (e.g., associate, an immediate family member, etc.) has a material financial interest, such as in the capacity as a board member, underwriter or advisor to an issuer of securities, etc.

Our firm is able to provide a broad range of advisory services to its clients, including financial planning and portfolio management. A fee may be earned by the firm for both of these services. A conflict of interest exists within these various client relationships and we hereby note that you always have the right to decide whether to act on a recommendation from an associate. If you elect to do so, you always have the right to do so through the professional of your choosing.

Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest

Our firm and its "related persons" may buy or sell securities similar to, or different from, those we recommend to clients for their accounts. Our policy is designed to assure that the personal securities transactions, activities and interests of the employees of our firm will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. In an effort to reduce or eliminate certain conflicts of interest involving the firm or personal trading, our policy may require that we restrict or prohibit associates' transactions in specific reportable securities transactions. Any exceptions or trading pre-clearance must be approved by the firm principal in advance of the transaction in an account, and we maintain the required personal securities transaction records per regulation.

Trading Securities at/Around the Same Time as Client's Securities

From time to time, our firm or its "related persons" may buy or sell securities for themselves at or around the same time as clients. We will not trade non-mutual fund securities prior to the same security for clients on the same day.

Investment Advice Relating to Retirement Accounts

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

In addition, and as required by this rule, we provide information regarding the services that we provide to you, and any material conflicts of interest, in this brochure and in your client agreement.

Item 12: Brokerage Practices

Factors Used to Select Custodians and/or Broker-Dealers

We recommend that our clients use MTG, LLC dba Betterment Securities ("Betterment Securities"), a registered broker-dealer and member of the SIPC, as the qualified custodian. We are independently owned and operated and are not affiliated with Betterment Securities. While we recommend that you use Betterment Securities as your custodian, you will decide whether to do so and will open your account with them by entering into an account agreement directly with them. We do not technically open the account for you, although we assist you in doing so. If you do not wish to place your assets with Betterment Securities as the custodian of record, we are unable to manage your account under our portfolio management services engagement and another service (e.g., our investment consultation engagement) would be necessary.

How We Select Brokers/Custodians

We seek to recommend a custodian/broker that will hold your assets and execute transactions on terms that are, overall, most advantageous when compared with other available providers and their services. We consider a wide range of factors, including:

- Capability to execute, clear, and settle trades (buy and sell securities for your account) itself or to facilitate such services (see Item 15). Your account must be maintained by a qualified custodian, such as a broker/dealer, bank or trust company. Our firm is not a custodian nor is there an affiliate that is a custodian.
- Capability to facilitate timely transfers and payments to and from accounts.
- Availability of investment research and tools that assist us in making investment decisions.
- Quality of services.
- Competitiveness of the price of those services and willingness to negotiate the prices.
- Reputation, financial strength, and stability.
- Prior service to us and our other clients.

Your Brokerage and Custody Costs

For our clients' accounts that Betterment Securities maintains, Betterment Securities does not charge you separately for custody/brokerage services, but is compensated as part of the Betterment for Advisors (defined below) platform fee, which is charged for a suite of platform services, including custody, brokerage, and sub-advisory services provided by Betterment and access to the Betterment for Advisors platform. The platform fee is an asset-based fee charged as a percentage of assets in your Betterment account.

Clients utilizing the Betterment for Advisors platform may pay a higher aggregate fee than if the investment management, brokerage and other platform services are purchased separately. Nonetheless, for those Clients participating in the Betterment for Advisors platform, we have determined that having Betterment Securities execute trades is consistent with our duty to seek "best execution" of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see "How we select brokers/custodians").

<u>Services Available to Us Via Betterment for Advisors</u>

Betterment Securities serves as broker-dealer to Betterment for Advisors, an investment and advice platform serving independent investment advisory firms like us ("Betterment for Advisors"). 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:

1. **Services That Benefit You**. Betterment for Advisors includes access to a globally diversified, low-cost portfolio of ETFs, execution of securities transactions, and custody of client assets through Betterment Securities. In addition, a series of model portfolios created by third-party providers are also available on the platform. Betterment Securities' services described in this paragraph generally benefit you and your account.
2. **Services That May Not Directly Benefit You.** Betterment Institutional also makes available to our firm 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.
3. By using Betterment for Advisors, we may be offered other services intended to help us manage and further develop our business enterprise. These services include:
   - ➢ Consulting (including through webinars) on technology and business needs.
   - ➢ Access to publications and conferences on practice management and business succession.

Our Interest in Betterment Securities' Services

The availability of these services from Betterment for Advisors benefits us because we do not have to produce or purchase them. In addition, we do not have to pay for Betterment Securities' services. We have an incentive to recommend that you maintain your account with Betterment Securities, based on our interest in receiving Betterment for Advisors and Betterment Securities' services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions.

This is a conflict of interest. We believe, however, that our selection of Betterment Securities as custodian and broker is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Betterment Securities' services (see "How we select brokers/custodians") and not Betterment for Advisors and Betterment Securities' services that benefit only us or that may not directly benefit you.

Betterment for Advisors' Trading Policy

When using the Betterment for Advisors platform, we and you are subject to the trading policies and procedures established by Betterment. These policies and procedures limit our ability to control, among other things, the timing of the execution of certain trades (including in response to withdrawals, deposits, or asset allocation changes) within your account. You should not expect that trading on Betterment is instant, and, accordingly, you should be aware that Betterment does not permit you or us to control the specific time during a day that securities are bought or sold in your account (i.e., to "time the market"). Betterment describes its trading policies in Betterment LLC's Form ADV Part 2A. As detailed in that document, Betterment generally trades on the same business day as it receives instructions from you or us. However, transactions will be subject to processing delays in certain circumstances. In particular, orders initiated on non-business days and after markets close generally will not transact until the next business day. Betterment also maintains a general approach of not placing securities orders during approximately the first thirty minutes after the opening of any market session. Betterment also generally stops placing orders arising from allocation changes in existing portfolios approximately thirty minutes before the close of any market session. Betterment continues placing orders associated with deposit and withdrawal requests until market close. Betterment maintains a general approach of not placing orders around the time of scheduled Federal Reserve interest rate announcements. Furthermore, Betterment may delay or manage trading in response to market instability. For further information, please consult Betterment LLC's Form ADV Part 2A.

Some of the noted products and services made available by Betterment Securities and/or Betterment Institutional may benefit our firm but may not directly benefit a client account, and certain research and other previously referenced services qualify as "brokerage or research services" under Section 28(e) of the Securities Exchange Act of 1934. The availability of these services from Betterment Securities and/or Betterment Institutional benefits us because we do not have to produce or purchase them. These services may be contingent upon us committing a certain amount of business to Betterment Securities in assets in custody. We have an incentive to recommend that you maintain your account with Betterment Securities, based on our interest in receiving Betterment Institutional and Betterment Securities' services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a conflict of interest. We believe, however, that our selection of Betterment Securities as custodian and broker is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Betterment Securities' services (as noted) and not Betterment Institutional and Betterment Securities' services that benefit only us. Further, we owe the client a fiduciary duty to put the client's interest first which includes, but is not limited to, a duty of care, loyalty, obedience, and utmost good faith.
We periodically conduct an assessment of any service provider we recommend (including Betterment Securities) which generally involves a review of their range and quality of services, reasonableness of fees, among other items, and in comparison, to their industry peers.

Our firm has determined having portfolio management services account trades completed through Betterment Securities is consistent with our duty to seek best execution. We also periodically review policies regarding our recommending custodians to our clients in light of our duty to seek best execution.

Directed Brokerage

We do not trade away from the client's custodian, and we do not permit directed brokerage.

Aggregating Securities Transactions

Betterment may block client trades at their discretion. Their specific practices are further discussed in their ADV Part 2A, Item 12. Betterment places aggregated orders involving multiple Betterment accounts trading in the same securities. In conducting these transactions no client is favored over any other client and each client that participates in an aggregated transaction will participate at the average share price for transactions in the aggregated order.

Client Referrals from Custodians

We do not receive referrals from our custodian; nor are client referrals a factor in our selection of our custodian.

Item 13: Review of Accounts

Schedule for Periodic Review and Advisory Persons Involved

Financial Planning and Investment Consultation Services

For those clients who have engaged our firm for ongoing planning services, we will schedule reviews with you in advance. It will be your responsibility to initiate a review if your agreement does not involve continuous financial planning support, and these reviews are recommended on at least on an annual basis whenever practical.

Reviews will be conducted by Ms. Daigle and normally involve analysis and possible revision of your previous financial plan or investment allocation. A copy of revised plans or asset allocation reports will be provided to the client upon request.

Unless provided for in your engagement agreement (e.g., ongoing support), financial planning and investment consultation services reviews are conducted under a new or amended agreement and will be assessed at our current fee rate.

Portfolio Management Services

Portfolio management services accounts are reviewed on a frequent basis by Ms. Daigle, and no less than quarterly. Client-level reviews are also completed with you and your assigned investment advisor representative, and we recommend that they occur on at least an annual basis. A copy of an asset allocation report will be provided to the client upon request. This report would include fund name, ticker, and percentage allocation.

Review of Client Accounts on Non-Periodic Basis

Financial Planning and Investment Consultation Services

We strongly recommend you contact our firm for an additional review when you anticipate or have experienced changes in your financial situation (i.e., employment or marital status, inheritance, the birth of a new child, etc.). Non-periodic reviews are generally conducted by Ms. Daigle, which may occur under a new or amended agreement unless previously engaged in writing and will be assessed at our published rate. A copy of revised plans or asset allocation reports will be provided to the client upon request.

Portfolio Management Services

Additional reviews by Ms. Daigle and/or the selected external model manager may be triggered by news or research related to a specific holding, a change in our view of the merits of a holding, or news related to the macroeconomic climate affecting a sector or holding within that sector. Accounts may be also reviewed for an additional holding or when an increase in a current position is under consideration. Account cash levels above or below what we deem appropriate for the investment environment, given the client's stated tolerance for risk and investment objectives, may also trigger a review. A copy of revised asset allocation reports will be provided to the client upon request.

Content of Client Provided Reports and Frequency

Whether you have opened and maintained an investment account on your own or with our assistance, you will receive account statements sent directly from mutual fund companies, transfer agents, custodians or brokerage companies where your investments are held. We urge you to carefully review these account statements for accuracy and clarity, and to ask questions when something is not clear.

Our firm may provide portfolio “snapshots” if we are engaged to provide periodic asset allocation or investment advice. We do not provide ongoing performance reporting under our investment consultation services engagements. For portfolio management services accounts, clients may receive performance reports from our firm that have been generated from our custodian’s data systems. We do not provide our own performance reports. Clients may also receive quarterly portfolio performance reports from their selected portfolio model manager.

Clients are urged to carefully review and compare account statements that they have received directly from their custodian of record with any document they may receive from our firm or any other party should the report contain portfolio performance information.

Item 14: Client Referrals and Other Compensation

Economic Benefit from External Sources and Conflicts of Interest

We receive a non-economic benefit from Betterment Institutional and Betterment Securities in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at Betterment Securities. These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12—Brokerage Practices). The availability to us of Betterment Institutional and Betterment Securities’ products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

Advisory Firm Payments for Client Referrals

We do not receive any economic benefit, directly or indirectly from any third party for advice rendered to our clients. Nor do we directly or indirectly compensate any person who is not advisory personnel for client referrals. We do not pay any third-parties for prospective client referrals, nor is there a fee-sharing arrangement reflective of a solicitor engagement.

Item 15: Custody

We do not maintain physical custody of client assets. For clients enrolled in our portfolio management system, Betterment Securities maintains actual custody of your assets. Your statements will be available for you to review on the activity section of your Betterment for Advisors account portal. You will also receive account statements directly from Betterment Securities at least quarterly at www.bettermentsecurities.com. You should carefully review those statements promptly and compare them to the invoices you receive from us and notify us of any discrepancies.

Your assets will be maintained by an unaffiliated, qualified custodian, such as a bank, broker/dealer (e.g., Betterment Securities), mutual fund companies, or transfer agent. Your assets are not held by our firm or any associate or our firm. In keeping with this policy involving our client funds or securities, Gen Y Planning:

- Restricts the firm or an associate from serving as trustee or having general power of attorney over a client account.
- Prohibits any associate from having authority to directly withdraw securities or cash assets from a client account. Although we may be deemed to have "constructive custody" of your assets since we may request the withdrawal of advisory fees from an account, we will only do so through the engagement of a qualified custodian maintaining your account assets, via your prior written authorization, and following our written invoice;
- Does not accept or forward client securities (i.e., stock certificates) erroneously delivered to our firm.
- Will not collect advance fees of $500 or more for services that are to be performed six months or more into the future; and
- Will not authorize an associate to have knowledge of a client's account access information (i.e., online 401(k), brokerage or bank accounts) if such access would allow physical control over account assets.

The custodian of record will provide the client with the account transaction confirmations and statements, which will include all debits and credits, as well as reference to our firm's advisory fee for that period.

Statements are provided on at least a quarterly basis and confirmations are provided as transactions occur within the client account. Gen Y Planning will not create an account statement for a client or serve as the sole recipient of an account statement.

Should a client receive a report and invoices from our advisory firm that includes investment performance information, they are urged to carefully review and compare their account statements that they have received directly from their custodian of record with any performance report from our firm.

Item 16: Investment Discretion

Portfolio Management Services

Gen Y Planning provides portfolio management services on a *discretionary basis*. Similar to a limited power of attorney, discretionary authority allows our firm to implement investment strategies and trading decisions, such as the purchase or sale of a security on behalf of your account, without requiring your prior authorization for each transaction in order to meet stated investment objectives. This authority will be granted through your execution of our client engagement agreement as well as the custodian of record's limited power of attorney agreement. The custodian will specifically limit our authority within your account to the placement of trade orders and the request for the deduction of advisory fees.

Item 17: Voting Client Securities

You may receive proxies or other similar solicitations sent directly from your selected custodian or transfer agent. Should our firm receive a duplicate copy, it will generally not be forwarded, nor any other correspondence relating to the voting of your securities, class action litigation, or other corporate actions.

Our firm does not vote proxies on a client's behalf, including those accounts that we have discretionary authority over; nor do we offer specific guidance on how to vote proxies. We will not offer guidance involving any claim or potential claim in any bankruptcy proceeding, class action securities litigation or other litigation or proceeding relating to securities held at any time in a client account, including, without limitation, to file proofs of claim or other documents related to such proceeding, or to investigate, initiate, supervise or monitor class action or other litigation involving client assets. However, we will answer limited questions with respect to what a proxy voting request or other corporate matter may be and how to reach the issuer or its legal representative. It is not uncommon for external model managers to vote client proxies, and you should review that manager's advisory brochure to determine their proxy voting policy.

We will have no power, authority, responsibility, or obligation to take any action with regard to any claim or potential claim in any bankruptcy proceeding, class action securities litigation or other litigation or proceeding relating to securities held at any time in a client account, including, without limitation, to file proofs of claim or other documents related to such proceeding, or to investigate, initiate, supervise or monitor class action or other litigation involving client assets. You should review external model managers' advisory brochure to determine their policy with respect to any claim or potential claim in any bankruptcy proceeding, class action securities litigation or other litigation or proceeding relating to securities held in a client account.

Item 18: Financial Information

Our advisory firm will not take physical custody of the client assets. Fee withdrawals must be done through a qualified intermediary (e.g., the custodian of record), per the client's prior written agreement, and following the client's receipt of our firm's written notice (termed "constructive custody").

Engagements with our firm do not require that we collect advance fees from a client of $500 or more for our advisory services that we have agreed to perform six months or more into the future.

Neither our firm nor its management serve as general partner for a partnership or trustee for a trust in which the firm's advisory clients are either partners of the partnership or beneficiaries of the trust.

The firm and its management do not have a financial condition likely to impair its ability to meet commitments to clients, nor has the firm and its management been the subject of a bankruptcy petition.

Due to the nature of our firm's advisory services and operational practices, an audited balance sheet is not required nor included in this brochure.

Item 19: Requirements for State-Registered Advisers

Sophia Bera Daigle

Born: 1984

Managing Member/Founder/Chief Compliance Officer (Supervisor)/Investment Advisor Representative

Educational Background

- CERTIFIED FINANCIAL PLANNER™, CFP® - Certified Financial Planner Board of Standards, Inc.
- Bachelor of Arts in Theatre and Women's Studies, Minnesota State University at Mankato; Mankato, MN

Business Experience

- 2013 – Present, Gen Y Planning LLC, Austin, TX, Managing Member/Founder/Chief Compliance Officer (Supervisor)/Investment Advisor Representative
- 2016 – Present, Sophia Bera, LLC, Founder and Owner
- 2017 – 2018, Ellevest Financial Planning Services, New York, NY, Investment Advisor Representative
- 2012 – 2014, Minnesota State University, Mankato, MN, Adjunct Faculty Member
- 2012, Learnvest Planning Services, LLC (2012), New York, NY (Minneapolis, MN Office), Financial Planner
- 2010 – 2012, Cahill Financial Advisors, Inc., Edina, MN, Associate Planner
- 2007 – 2010, Berger Financial Group, LLC., Cambridge Investment Research, Inc., Fairfield, IA, (Medicine Lake, MN Office), Portfolio Accountant, Investment Advisor Representative/Registered Representative. [Registration requirement due to role with Berger Financial Group, Inc.]

Professional Designations, Licensing & Exams

CERTIFIED FINANCIAL PLANNER™ professional

I am certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). Therefore, I may refer to myself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and I may use these and CFP Board's other certification marks (the "CFP Board Certification Marks"). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at www.cfp.net.

CFP® professionals have met CFP Board's high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

- **Education** – Earn a bachelor's degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials.
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual's ability to integrate and apply a broad base of financial planning knowledge in the

context of real-life financial planning situations.

- **Experience** – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- **Ethics** – Satisfy the *Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement* and agree to be bound by CFP Board's *Code of Ethics and Standards of Conduct ("Code and Standards")*, which sets forth the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

- **Ethics** – Commit to complying with CFP Board's *Code and Standards*. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP® professional who does not abide by this commitment, but CFP Board does not guarantee a CFP® professional's services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.
- **Continuing Education** – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the *Code and Standards*.

Other Business Activities

Ms. Daigle is the Founder and Owner of Sophia Bera LLC, a firm that conducts speaking engagements and/or seminars addressing general financial planning topics. She devotes approximately 2 hours a week to this endeavor, none during trading hours.

Ms. Daigle is not registered, nor has an application pending to register, as a registered representative of a broker/dealer or associated person of a futures commission merchant, commodity pool operator, or commodity trading advisor. She does not receive commissions, bonuses or other compensation based on the sale of securities, including that as a registered representative of a broker/dealer or the distribution or service ("trail") fees from the sale of mutual funds.

Performance Based Fees

Gen Y is not compensated by performance-based fees.

Material Disciplinary Disclosures

No management person at Gen Y Planning LLC has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Please note, the disciplinary history of GenY and its representatives can be obtained from The Commonwealth of Massachusetts Securities Division.

Material Relationships That Management Persons Have with Issuers of Securities

Gen Y Planning LLC, nor Ms. Daigle, have any relationship or arrangement with issuers of securities.

Privacy Notice

FACTS	WHAT DOES GEN Y PLANNING LLC DO WITH YOUR PERSONAL INFORMATION?
Why?	Registered Investment Advisers choose how they share your personal information. Federal law gives clients the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
What?	The types of personal information we collect, and share depend on the product or service you have with us. This information can include: ▪ Information you provide in the subscription documents and other forms (including name, address, social security number, date of birth, income and other financial-related information); and ▪ Data about your transactions with us (such as the types of investments you have made and your account status).
How?	All financial companies need to share clients' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their clients' personal information; the reasons Gen Y Planning LLC chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information
For our everyday business purposes— to process your transactions, maintain your accounts (for example we may share with our third-party service providers that perform services on our behalf or on your behalf, such as accountants, attorneys, consultants, clearing and custodial firms, and technology companies, respond to court orders and legal investigations, or report to credit bureaus.
For Marketing purposes— to offer our products and services to you

How do we protect your information?
To safeguard your personal information from unauthorized access and use, we maintain physical, procedural and electronic safeguards. These include computer safeguards such as passwords, secured files and buildings.
Our employees are advised about Gen Y's need to respect the confidentiality of each client's non-public personal information. We train our employees on their responsibilities.
We require third parties that assist in providing our services to you to protect the personal information they receive. This includes contractual language in our third-party agreements.

Other important information
We will send you notice of our Privacy Policy annually for as long as you maintain an ongoing relationship with us. Periodically we may revise our Privacy Policy and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.
Massachusetts
In response to a Massachusetts law, clients must "opt-in" to share non-public personal information with non-affiliated third parties before any personal information is disclosed. We may disclose non-public personal information to other financial institutions with whom we have joint business arrangements for proper business purposes in connection with the management or servicing of your account.

Gen Y Planning LLC

1401 Lavaca Street, PMB 47955
Austin, TX 78701

(612) 790-7955
www.genyplanning.com

Dated March 20, 2025

Form ADV Part 2B – Brochure Supplement

For

Sophia Bera Daigle, CFP®

Managing Member, Founder, and CCO

This brochure provides information about Ms. Sophia B. Daigle, the firm's principal executive and supplements the Gen Y Planning LLC advisory brochure referenced in the preceding pages. If you have any questions about the contents of this supplement, please contact Ms. Daigle by telephone at (612) 790-7955. Additional information about Ms. Daigle and Gen Y Planning, LLC is available on the SEC website at www.adviserinfo.sec.gov.

Item 2: Educational Background and Business Experience

Regulatory guidance requires the firm to disclose relevant post-secondary education and professional training for each principal executive and associate of the firm, as well as their business experience for at least the most recent five years.

Principal Executive Officers and Management Persons
Managing Member/Founder/Chief Compliance Officer (Supervisor)/Investment Advisor Representative

Sophia Bera Daigle
Year of Birth: 1984
CRD Number: 5499671

Educational Background

- CERTIFIED FINANCIAL PLANNER™, CFP® - Certified Financial Planner Board of Standards, Inc.
- Bachelor of Arts in Theatre and Women's Studies, Minnesota State University at Mankato; Mankato, MN

Business Experience

- 2013 – Present, Gen Y Planning LLC, Austin, TX, Managing Member/Founder/Chief Compliance Officer (Supervisor)/Investment Advisor Representative
- 2016 – Present, Sophia Bera, LLC, Founder and Owner
- 2017 – 2018, Ellevest Financial Planning Services, New York, NY, Investment Advisor Representative
- 2012 – 2014, Minnesota State University, Mankato, MN, Adjunct Faculty Member
- 2012, Learnvest Planning Services, LLC (2012), New York, NY (Minneapolis, MN Office), Financial Planner
- 2010 – 2012, Cahill Financial Advisors, Inc., Edina, MN, Associate Planner
- 2007 – 2010, Berger Financial Group, LLC., Cambridge Investment Research, Inc., Fairfield, IA, (Medicine Lake, MN Office), Portfolio Accountant, Investment Advisor Representative/Registered Representative. [Registration requirement due to role with Berger Financial Group, Inc.]

Professional Designations, Licensing & Exams

CERTIFIED FINANCIAL PLANNER™ professional

I am certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). Therefore, I may refer to myself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and I may use these and CFP Board's other certification marks (the "CFP Board Certification Marks"). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at www.cfp.net.

CFP® professionals have met CFP Board's high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

- **Education** – Earn a bachelor's degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program.

The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials.

- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual's ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- **Experience** – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- **Ethics** – Satisfy the *Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement* and agree to be bound by CFP Board's *Code of Ethics and Standards of Conduct ("Code and Standards")*, which sets forth the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

- **Ethics** – Commit to complying with CFP Board's *Code and Standards*. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP® professional who does not abide by this commitment, but CFP Board does not guarantee a CFP® professional's services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.
- **Continuing Education** – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the *Code and Standards*.

Item 3: Disciplinary Information

Registered investment advisors are required to disclose certain material facts about its associated personnel regarding any legal or disciplinary events, including criminal or civil action in a domestic, foreign or military court, or any proceeding before a state, federal or foreign regulatory agency, self-regulatory organization, or suspension or sanction by a professional association for violation of its conduct rules, that would be material to the evaluation of each officer or a supervised person providing investment advice. No reportable information is applicable to this section for Ms. Daigle or Gen Y Planning LLC.

Item 4: Other Business Activities

Ms. Daigle is the Founder and Owner of Sophia Bera LLC, a firm that conducts speaking engagements and/or seminars addressing general financial planning topics. She devotes approximately 2 hours a week to this endeavor, none during trading hours.

Item 5: Additional Compensation

Ms. Daigle is not compensated for advisory services involving performance-based fees. Firm policy does not allow associated persons to accept or receive additional economic benefit, such as sales awards or other prizes, for providing advisory services to firm clients.

Item 6: Supervision

Ms. Daigle serves as the firm's Chief Compliance Officer. Because supervising oneself poses a conflict of interest, the firm has adopted policies and procedures to mitigate this conflict, which Ms. Daigle will adhere to, and may use the services of unaffiliated professionals to ensure the firm's oversight obligations are met. Questions relative to the firm, its services or this Form ADV Part 2 may be made to the attention of Ms. Daigle at (612) 790-7955.

Additional information about the firm, other advisory firms, or an associated investment advisor representative, including Ms. Daigle, is available on the Internet at www.adviserinfo.sec.gov. A search of this site for firms may be accomplished by firm name or a unique firm identifier, known as an IARD number. The IARD number for Gen Y Planning LLC is 167656. You may also search Ms. Daigle by name or their industry reference number ("CRD #"), which is 5499671.

Item 7: Requirements for State Registered Advisers

There have been neither awards nor sanctions or other matters where Ms. Daigle or our firm has been found liable in a self-regulatory or administrative proceeding. Ms. Daigle and the firm have not been the subject of a bankruptcy petition.

Gen Y Planning LLC
1401 Lavaca Street, PMB 47955
Austin, TX 78701

(612) 790-7955
www.genyplanning.com

Dated March 20, 2025

Form ADV Part 2B – Brochure Supplement

For

Nia Saville, CFP®

Lead Planner

This brochure provides information about Nia Saville, Lead Planner, and supplements the Gen Y Planning LLC advisory brochure referenced in the preceding pages. If you have any questions about the contents of this supplement, please contact Ms. Daigle by telephone at (612) 790-7955. Additional information about Ms. Saville and Gen Y Planning, LLC is available on the SEC website at www.adviserinfo.sec.gov.

Item 2: Educational Background and Business Experience

Regulatory guidance requires the firm to disclose relevant post-secondary education and professional training for each principal executive and associate of the firm, as well as their business experience for at least the most recent five years.

Nia Saville, CFP®
Year of Birth: 1992
CRD Number: 7244861

Educational Background

- CERTIFIED FINANCIAL PLANNER™, CFP® - Certified Financial Planner Board of Standards, Inc.
- 2014 – Bachelor of Science, Psychology, University of Florida

Business Experience

- 09/2023 – Present, Gen Y Planning LLC, Associate Planner
- 03/2020 – Present, Bayroll LLC, Owner
- 09/2022 – 08/2023, Gen Y Planning LLC, Paraplanner
- 01/2019 – 12/2022, Justice Business Advisors Inc dba Tax and Accounting by the Bay, Office Manger
- 10/2020 – 12/2021, Securities America, Inc., Registered Representative

Professional Designations, Licensing & Exams

CERTIFIED FINANCIAL PLANNER™ professional

I am certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). Therefore, I may refer to myself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and I may use these and CFP Board's other certification marks (the "CFP Board Certification Marks"). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at www.cfp.net.

CFP® professionals have met CFP Board's high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

- **Education** – Earn a bachelor's degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials.
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual's ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.

- **Experience** – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- **Ethics** – Satisfy the *Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement* and agree to be bound by CFP Board's *Code of Ethics and Standards of Conduct ("Code and Standards")*, which sets forth the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

- **Ethics** – Commit to complying with CFP Board's *Code and Standards*. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP® professional who does not abide by this commitment, but CFP Board does not guarantee a CFP® professional's services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.
- **Continuing Education** – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the *Code and Standards*.

Item 3: Disciplinary Information

Registered investment advisors are required to disclose certain material facts about its associated personnel regarding any legal or disciplinary events, including criminal or civil action in a domestic, foreign or military court, or any proceeding before a state, federal or foreign regulatory agency, self-regulatory organization, or suspension or sanction by a professional association for violation of its conduct rules, that would be material to the evaluation of each officer or a supervised person providing investment advice. No reportable information is applicable to this section for Ms. Saville, or Gen Y Planning LLC.

Item 4: Other Business Activities

Ms. Saville is the Owner of Bayroll, LLC, a payroll processing firm. She devotes 10 hours a month to this activity, most of which during trading hours.

Item 5: Additional Compensation

Ms. Saville is not compensated for advisory services involving performance-based fees. Firm policy does not allow associated persons to accept or receive additional economic benefit, such as sales awards or other prizes, for providing advisory services to firm clients.

Item 6: Supervision

Ms. Daigle serves as the firm's Chief Compliance Officer and is responsible for supervision of Ms. Saville and may be contacted at (612) 790-7955.

Additional information about the firm, other advisory firms, or an associated investment advisor representative is available on the Internet at www.adviserinfo.sec.gov. A search of this site for firms may be accomplished by firm name or a unique firm identifier, known as an IARD number. The IARD number for Gen Y Planning LLC is 167656. You may also search Ms. Saville by name or their industry reference number (“CRD #”), which is 7244861.

Item 7: Requirements for State Registered Advisers

There have been neither awards nor sanctions nor other matters where Ms. Saville or our firm has been found liable in a self-regulatory or administrative proceeding. Ms. Saville and the firm have not been the subject of a bankruptcy petition.