DATED: MARCH 31, 2021

Item 1. Introduction

CSP Planning Corp ("CSP" "we" "us" and "Advisor") is an Oregon corporation registered as an investment advisor under the rules and regulations of the Securities and Exchange Commission.

Our investment advisory services are coordinated through our network of Advisory Affiliates. Advisory Affiliates may have their own legal business entities whose trade names and logos are used for marketing purposes and may appear on marketing materials or client statements. The Client should understand that the businesses are legal entities of the Advisory Affiliate and not of our firm, CSP, and the advisory services of the Advisory Affiliate are provided through our firm, CSP.

Brokerage and investment advisory services and fees differ and it is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at Investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.

Item 2. Relationships and Services

What investment services and advice can you provide me?

We provide investment supervisory, financial planning, and investment consulting services. Our investment recommendations include mutual funds and other investments such as exchange-traded funds, and exchange-listed equity securities, certificates of deposit, municipal securities, U.S. government securities and money market funds when suitable and appropriate for a Client's particular situation. If Clients hold other types of investments, we may also advise them on those investments. Clients may impose restrictions on investing in certain securities or types of securities. We consider such restrictions when formulating the Client's investment strategy. After Client assets are invested, we continuously monitor their investments and provide advice related to ongoing financial and investment needs.

Generally, Clients grant us discretionary authority to execute investment recommendations in accordance with an agreed upon investment strategy or plan without the Client's prior approval of each specific transaction. Under discretionary authority, Clients allow us to purchase and sell securities and instruments in their account(s), arrange for delivery and payment in connection with the foregoing, select and retain sub-advisors, and act on behalf of the Client in matters necessary or incidental to the handling of the account, including monitoring certain assets. The only restrictions on this discretionary authority are those set by the Client on a case by case basis. There are no account minimums.

In addition to wealth management services, we may offer financial planning services to Clients under a separate Financial Planning Agreement.

Each Advisory Affiliates' services and fees differ slightly depending on which Advisory Affiliate you choose. Please search for your advisors' Form ADV 2A, Firm Brochure found at adviserinfo.sec.gov/firm/brochure/149937 for more detailed information on what services and fees apply to your relationship.

Conversation Starter: We encourage you to ask our financial professionals these key questions about our investment services and accounts:

- (i) Given my financial situation, should I choose an investment advisory service? Why or why not?
- (ii) How will you choose investments to recommend to me?
- (iii) What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?

Item 3. Fees, Costs, Conflicts, and Standard of Conduct

What fees will I pay?

We provide investment advisory services for a fee based on a percentage of assets under management. The final fee charged is reflected in your Investment Advisory Agreement but is never greater than 2.05% of assets under management. Fees are calculated quarterly, in advance or arrears, and will be equal to the respective percentage per annum based on the market value of your account(s) on the last trading day of the previous quarter.

We may also provide standalone consulting or financial planning services to Clients on a fixed fee or hourly rate under a separate Consulting or Financial Planning Agreement. Our fixed and hourly fee pricing is quoted for each project, and is based on the scope and complexity of the project. Prior to commencing planning services, Clients enter into a Consulting or Financial Planning Agreement which sets forth the services being provided and the fees being charged. Notwithstanding the above, fees are generally negotiable.

Each Advisory Affiliates' services and fees defer slightly depending on which Advisory Affiliate you choose. Please search for your advisors' Form ADV 2A, Firm Brochure found on adviserinfo.sec.gov/firm/brochure/149937 for more detailed information on what services and fees apply to your relationship.

The more assets you have in the advisory account, the more you may pay us. We therefore may have an incentive to increase the assets in your account in order to increase our fees. You pay our fee quarterly regardless of whether we buy or sell securities within that quarter.

Clients may be required to pay other miscellaneous charges or fees directly to the custodian (e.g. wire fees) as stated in the custodial agreements. Additionally, mutual funds and/or exchange traded funds have additional internal expenses which generally include a fund management fee, other fund expenses, and a possible distribution fee. In addition, some funds charge a redemption fee on shares bought and sold within a short period. Funds describe their expenses in their prospectuses, summary prospectuses, or product descriptions. Clients may also be charged up to \$35.00 per trade as an administrative fee for Client directed trades.

In some instances, we may recommend that all or a portion of Client assets be managed by an unrelated Third-Party Asset Manager ("TPAM") or sub-advisor. These services may include the construction of investment portfolios, execution of securities purchase and sale transactions, and portfolio administration,

including tracking of and reporting on portfolio performance and investment results. Clients are generally required to enter into a separate advisory agreement with any TPAM or sub-advisor. The use of TPAMs or sub-advisors may cause Clients to incur additional fees. If applicable, any additional fees will be fully disclosed to Clients in a separate agreement with the TPAM or sub-advisor.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

Conversation Starter: We encourage you to ask us any questions you may have regarding our fees or how cost from third parties such as custodians or mutual funds affect your account. For example, start a conversation by asking, "Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?"

What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means:

<u>Example 1</u>: Your account value goes up, and while the management fee percentage may stay the same or decrease, the total compensation you pay us may go up accordingly. <u>Example 2</u>: Your account value goes down, but you still must pay a management fee proportional to your assets under management.

Advisory Affiliates of CSP may also be independently licensed as insurance agents with other agencies. Affiliates may recommend the purchase and sale of certain insurance products to Clients. As a fiduciary, the Affiliate must act primarily for the benefit of CSP clients and will only transact insurance related business with Clients when the products are fully disclosed, suitable, and appropriate to fit their needs, and in order to simplify the implementation of various wealth management strategies.

We are affiliated through common ownership with FocusPoint Solutions, Inc. ("FPS"), an SEC-registered investment advisory firm that provides back office and administrative services to both affiliated and non-affiliated registered investment advisory firms, including CSP. FPS also provides non-discretionary sub-advisory services to our clients; however, CSP is solely responsible for Client accounts. Due to our affiliation with FPS we have an incentive to recommend Fidelity as a custodian for Client accounts. FPS has entered into a support services agreement with Fidelity Brokerage Services LLC and National Financial Services LLC (together referred to as "Fidelity") where Fidelity pays FPS a support fee based on a portion of Client assets in the custody of Fidelity. However, FPS and Fidelity have agreed that no support fee payments will be made with respect to investments in transaction fee funds and Fidelity sponsored funds. While this arrangement results in cost savings for

the custodian and increased costs for FPS, the receipt of this additional compensation may create an incentive for CSP to recommend funds available through the Fidelity platform for which (i) Fidelity is not a sponsor or manager, and (ii) transaction fees are not imposed (together, "NTF Funds"). It would not be unusual for the majority of investments made through the Fidelity platform to be in NTF Funds, for which FPS would receive support fees. These conflicts are mitigated by our fiduciary duty to put our Clients' interests first. We review what types of funds are available for use in Client portfolio allocations and seek those that are the most suitable, appropriate and in the Client's best interest.

Conversation Starter: If you have any questions regarding conflicts of interests, please feel free to ask us. You can begin a conversation by asking, "How might your conflicts of interest affect me, and how will you address them?"

How do your financial professionals make money?

Our financial professionals are compensated based upon the amount of clients they serve, the assets under management, and revenue derived from clients. Financial professionals who are also insurance licensed may also receive commissions as described above.

Item 4. Disciplinary History

Do you or your financial professionals have legal or disciplinary history?

Yes. We encourage you to visit Investor.gov/CRS for a free and simple search tool to research any of our financial professionals.

Conversation Starter: In addition, feel free to ask: "As a financial professional, do you have any disciplinary history? For what type of conduct?"

Item 5. Additional Information

You can find additional information regarding CS Planning Corp and receive a copy of this relationship summary by contacting your advisor representative or visiting our website at <u>csplanningcorp.com</u>. We are always available to answer any of your questions.

A list of our Advisory Affiliates is available at: adviserinfo.sec.gov/firm/brochure/149937, or by calling (503) 445-1957.

Conversation Starter: If you do have any concerns, please let us know by asking the following questions: "Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?"