



## Form ADV Part 2A – Firm Brochure

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### Item 1: Cover Page

This Firm Brochure provides information about the qualifications and business practices of wHealthyFP LLC, doing business as HealthyFP. If you have any questions about the contents of this Brochure, please contact us at (215) 510-7597. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

HealthyFP is a registered investment adviser. Registration does not imply a certain level of skill or training.

Additional information about HealthyFP also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov), which can be found using the firm's identification number, 336494.

## **Item 2: Material Changes**

We will initially provide you with a copy of our Firm Brochure when we enter into an advisory agreement with you. From time to time, we may amend this Brochure to reflect changes in our business practices, changes in regulations, and routine annual updates as required by securities regulators. Either this complete Brochure or a summary of material changes shall be provided to each client annually and if a material change occurs in the business practices of HealthyFP. We will promptly update and deliver this Brochure when material changes occur.

Since becoming approved as an investment adviser on June 25, 2025, the following material changes have been made to the Brochure:

- HealthyFP has added educational seminars and workshops as a service. See Item 4 for further information regarding this service and Item 5 for the associated fees.
- Robert Wolfe, the firm's principal, has disclosed new financial industry affiliations. See Item 10 below for further information.
- The firm receives compensation through its participation in the AdSense for YouTube program. See Item 14 below for further information.

You can request a current copy of our Brochure at any time without charge by contacting us at (215) 510-7597 or from our website at [www.healthyfp.com](http://www.healthyfp.com). You can also obtain a copy of our current Brochure from the SEC's website as described in Item 1 above.

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## Item 4: Advisory Business

### Description of Advisory Firm

wHealthyFP LLC, doing business as HealthyFP, is an investment adviser principally located in the Commonwealth of Pennsylvania. We are a limited liability company founded in April 2025 and first became registered in June 2025. Robert Wolfe is the principal owner and Chief Compliance Officer (“CCO”). Information regarding his formal education and business background can be found in the accompanying Form ADV Part 2B (“Brochure Supplement”).

### Types of Advisory Services

We offer financial planning services, investment management services, tax preparation services, retirement plan services, and educational workshops and seminars. Each of our services is described in more detail below.

From time to time, we may recommend third-party professionals to clients, such as attorneys, accountants, tax advisors, insurance agents, or other financial professionals. Clients are never obligated to utilize any third-party professional we recommend. HealthyFP is not affiliated with, nor do we, receive any compensation from third-party professionals we recommend.

We tailor our advisory services to the individual needs of our clients. We believe that financial planning is a critical component of financial health and it is the foundation for each of our service packages outlined below. In general, our advice and recommendations will address some or all of the following areas of concern, depending on the service you select or your individual needs. The client and HealthyFP will work together to select specific areas to cover. These areas may include, but are not limited to, the following:

- **Business Planning:** We provide advice to clients who currently operate their own business, are considering starting a business, or are planning for an exit from their current business. Under this type of engagement, we work with you to assess your current situation, identify your objectives, and develop a plan aimed at achieving your goals.
- **Cash Flow and Debt Management:** We will conduct a review of your income and expenses 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. We may also recommend what we believe to be an appropriate cash reserve that should be considered for emergencies and other financial goals, along with a review of accounts (such as money market funds) for such reserves, plus strategies to save desired amounts.
- **College Savings:** This review includes projecting the amount that will be needed to achieve college or other education funding goals, along with advice on ways for you to save the desired amount. We provide recommendations for savings strategies, and, if needed, we will review your financial picture as it relates to eligibility for financial aid or the best way to contribute to children and grandchildren.
- **Employee Benefits Optimization:** We will provide review and analysis as to whether you, as an employee, are taking the maximum advantage possible of your employee benefits. 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.
- **Estate Planning:** This review usually includes an analysis of your exposure to estate taxes and your current estate plan, which may include whether you have a will, 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

always 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, as needed.

- **Financial Goals:** We will help clients identify financial goals and develop a plan to reach them. We will identify what you plan to accomplish, what resources you will need to make it happen, how much time you will need to reach the goal, and how much you should budget for your goal.
- **Insurance:** We will review existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home, and automobile policies.
- **Investment Analysis:** This analysis may involve developing an asset allocation strategy to meet financial goals and risk tolerance, providing information on investment vehicles and strategies, reviewing employee stock options, as well as assisting you in establishing your own investment account at a selected custodian. The strategies and types of investments we may recommend are further discussed in Item 8 below.
- **Retirement Planning:** Our retirement planning typically includes projections of your likelihood of achieving your financial goals, focusing on financial independence as the primary objective. For situations where projections show less than the desired results, we may make recommendations, including those that may impact the original projections, by adjusting certain variables (such as working longer, saving more, spending less, or 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.
- **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 (that is, “self-insuring”).
- **Tax Planning Strategies:** Tax planning 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 accounts or specific investments should be owned based in part on their “tax efficiency,” with the 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 needed.

Financial planning recommendations are provided on a non-discretionary basis, which means that clients have the option to implement any of the recommendations we make. Unless the client engages a service plan that includes investment management services, we do not have any control over the timing or accuracy of any investment transactions executed by the client.

HealthyFP offers various levels of financial planning, investment management, and educational support. Each of the firm's current services are disclosed below.

## **Bronze | HealthyPlan**

With our Bronze Plan, we provide a HealthyPlan, which includes a financial plan as a limited-scope, one-time engagement. Our HealthyPlan is available for clients looking to address specific questions or issues and without the need for ongoing implementation or monitoring support. The client may choose from one or more of the above topics to cover or other areas, as requested and agreed to by HealthyFP. With this engagement, clients implement any planning or investment recommendations on their own.

Access to financial planning software is included with the Bronze Plan, and access will continue following the conclusion of the engagement. However, there will be no input or assistance from HealthyFP upon the conclusion of the plan discussions. Clients who are seeking additional help with the financial planning software may engage our Healthy Hourly Services, as described below.

## **Silver | HealthyPlanning**

With our Silver Plan, we provide HealthyPlanning, which encompasses ongoing financial planning and investment management. As part of the onboarding process, the client will be taken through a process to establish their goals and values around money. Clients will be required to provide pertinent information to help complete the following areas of analysis: net worth, cash flow, employee benefits, retirement planning, insurance, investments, college planning, estate planning, and any information relevant to their financial situation. The information provided will assist in developing both a financial plan and investment portfolio designed to help achieve the client's goals.

Once the client's information is reviewed, their detailed financial plan will be built and analyzed, and the findings, analysis, and potential changes to their current situation will be reviewed with them. HealthyFP will provide assistance with the implementation of our recommendations, update our projections as the client progresses toward their goals, adjust the plan as their financial circumstances change, and answer any questions regarding the plan as they arise. The plan and the client's financial situation and goals will be monitored throughout the year.

For clients whose financial plans include a review of estate planning, HealthyFP may pay for the preparation of estate planning documents through a recommended third-party service provider. Clients are not required to use our recommended provider and may choose to another professional. However, we will only pay for services rendered through our recommended providers.

As part of our Silver Plan, HealthyFP also provides continuous and ongoing management of the client's investment portfolio, based on the client's individual needs and investment objectives. We use the information provided in the financial planning process to formulate an investment strategy for the client's investment portfolio. The investment portfolio includes the client's brokerage accounts held by a qualified custodian for which they have appointed us as their investment adviser of record. Once the portfolio has been created, we will review the portfolio at least quarterly and, if needed, make updates based on the client's investment objectives. Account supervision is guided by the stated objectives of the client (such as maximum capital appreciation, growth, income, or growth and income), as well as risk tolerance and tax considerations.

When we provide investment management services, clients grant us limited authority to buy and sell securities on a discretionary basis. This means we are not required to give advance notice or seek client consent for any changes to the portfolio. However, clients may impose reasonable restrictions in their portfolios for investing in certain securities, types of securities, or industry sectors. More information on our trading authority is explained in [Item 16](#) below.

Clients engaging this Plan may also engage our tax preparation services, as described further below.

## **Gold | HealthyCFO**

With our Gold Plan, our HealthyCFO package includes all HealthyPlanning services described in our Silver Plan above. In addition, with the client's authorization and upon request, we will collaborate as needed with the client's other third-party professionals (such as estate planning attorney, insurance agent, or tax professional) to coordinate their financial plan. We will also have quarterly scheduled meetings to discuss the client's financial plan and investment portfolio, as well as their progress towards goals and objectives.

## **Healthy | Hourly Services**

With our Healthy Plan, we provide Hourly Services on an as-needed basis. This Plan is available for clients looking to address specific questions or issues. The client may choose from one or more of the above topics to cover or other areas, as requested and agreed to by HealthyFP. Hourly Services are most suitable for clients who engaged our Bronze Plan and who want to meet to discuss plan changes or who have ad hoc financial questions. With this Plan, a limited-scope financial plan may be provided based on the client's specific needs. We do not provide ongoing review or updates to the financial plan, unless the client engages us for an additional fee.

## **Tax Preparation Services**

We may offer tax preparation services to assist with the filing of federal and state tax returns for individuals and businesses, as determined on a case-by-case basis. This service is provided under a separate tax preparation agreement and may include additional costs. We may ask for an explanation or clarification of information provided, but we will not audit or otherwise verify client data. The client is responsible for the completeness and accuracy of information used to prepare the returns. Clients are not required to use our tax preparation services and may choose to use another tax professional.

## **Retirement Plan Services**

Our firm provides retirement plan services to plan sponsors and, where applicable, participants of employer-sponsored qualified retirement plans on an ongoing basis. Generally, such services consist of assisting the plan sponsor or plan fiduciary in establishing, monitoring, and reviewing their company's participant-directed retirement plan. As the needs of the plan sponsor dictate, areas of advising could include the design of an investment policy statement, investment review and recommendations, fee analysis, participant education, and vendor searches and analysis.

Pursuant to the needs of the plan sponsor and the advisory agreement, HealthyFP may be engaged to provide retirement plan services on a discretionary basis, as defined in ERISA Section 3(38), with respect to all or a portion of the plan's investments, including authority to select, monitor, and replace investment options in accordance with the terms of the agreement. Otherwise, we may provide these services on a non-discretionary basis and will make recommendations to the plan sponsor, and the plan sponsor will retain discretionary authority and/or control over plan assets.

We do not provide individualized investment advice to plan participants unless they separately engage one of our advisory services. With this service, we do not provide advice with respect to the following types of assets: employer securities, real estate (excluding real estate funds and publicly-traded real estate investment trusts), participant loans, non-publicly traded securities or assets, other illiquid investments, or brokerage window programs.

All retirement plan services are provided in compliance with the applicable state and federal regulations, including the Employee Retirement Income Securities Act of 1974, as amended ("ERISA"). With respect to assets that are part of an ERISA plan, when we accept appointments to provide our services to such accounts, we acknowledge our fiduciary role within the meaning of Section 3(21) of ERISA, or, where applicable and as agreed in writing, Section 3(38) of ERISA, but only with respect to the provision of services described in the advisory agreement. We do not assume the duties of or accept appointment as a trustee or plan administrator as defined in ERISA Section 3(16). We are not subject to any disqualifications under Section 411 of ERISA.

## **Educational Workshops and Seminars**

We could host educational workshops and seminars or participate in such events hosted by other organizations. Events could be in-person or virtual presentations providing content of an educational and

informational nature, but they will not include specific individualized advice. Content could include electronic visual aids, brochures, or other materials. The topic of the presentation will be agreed upon between us and the organizer of the event, but generally will cover subjects relating to personal finance, financial planning, and investing. Content will be appropriate for the knowledge and sophistication of the audience, as defined by the event organizer.

## **Types of Investments**

We primarily advise our clients regarding investments in stocks, bonds, mutual funds, exchange-traded funds, U.S. government and municipal securities, and cash and cash equivalents. We may also provide advice regarding investments held in the client's portfolio at the inception of our advisory relationship or other investment types not listed above, at the client's request. See Item 8 below for additional information on our portfolio management practices.

Clients are able to specify reasonable restrictions on investing in individual securities, types of securities, or industry sectors for their accounts. We will make a reasonable attempt to honor any restrictions you request, but in the case of pooled investment vehicles, such as mutual funds or exchange-traded funds where underlying holdings change frequently, we cannot guarantee restrictions will always be enforced. All such requests must be provided to HealthyFP in writing, and we will notify clients if we are unable to accommodate any requests.

## **Client-Tailored Services**

We tailor the delivery of our services to meet the individual needs of our clients. We consult with clients at the beginning of the engagement and on an ongoing basis, through the duration of their engagement with us, to determine their financial situation, investment objectives, risk tolerance, time horizon, and other factors that may impact their investment strategy or planning needs.

We will contact or attempt to contact you annually to confirm if there have been any changes in your financial situation or investment objectives or determine if you wish to impose or modify account restrictions. Because our services are based on your specific financial circumstances, you are urged to promptly notify us any time you experience changes to your circumstances, so we can determine if any changes to our recommendations are necessary.

We base our services on the information you provide to us. Inaccurate or incomplete information could result in an inaccurate or incomplete financial plan or investment strategy. To create a plan or strategy, we must make certain assumptions with respect to interest and inflation rates, past trends, and future projections of the performance of the market and economy. Past performance is no indication of future performance, and we cannot offer any guarantees or promises that your goals and objectives will be met. Changes to your personal financial circumstances, goals, or objectives could cause your plan or strategy to become inaccurate and out of date. We recommend you notify us promptly of any changes so your plan or strategy can be updated, if necessary.

## **Wrap Fee Programs**

We do not participate in wrap fee programs.

## **Assets Under Management**

As of our last fiscal year end, December 31, 2025, HealthyFP managed \$68,809 in assets on a discretionary basis and \$0 in assets on a non-discretionary basis. This section will be updated on at least an annual basis to reflect our assets under management as of December 31 of each year.

## Item 5: Fees and Compensation

Please note, unless a client has received this Firm Brochure at least 48 hours prior to signing an advisory agreement, the agreement may be terminated by the client within five business days of signing without penalty or incurring any fees. At no time do we require prepayment of \$1,200 or more six months or more in advance of rendering services.

How we are paid depends on the type of advisory services we provide. Below is a brief description of our fees. However, you should review your executed advisory agreement for more detailed information regarding the exact fees you will pay. Fees could be negotiable based on factors such as complexity of your financial situation, net worth, or assets under management. Complexity considers various factors of the client's financial circumstances, such as income, assets, liabilities, marital and family status, employment status, and number of financial areas that need to be addressed. In addition, we reserve the right to offer fee waivers or discounts at our sole discretion. Therefore, some clients could pay different fees than the fee schedules shown below or fees may vary by client for similar services. No increase to the agreed-upon fees outlined in a client's advisory agreement shall occur without prior client consent. Lower fees for comparable services may be available from other sources.

HealthyFP offers a one-time money back pledge. If, in the opinion of the client, they are not satisfied with our services, we will provide a fee waiver upon notification when terminating services. Clients engaged in our Silver Plan, Gold Plan, or retirement plan services will have their final fee payment waived. Clients engaged in our Bronze Plan or Healthy Plan services have the final half of their fee waived. However, we do not provide fee waivers for tax preparation services.

### Bronze | HealthyPlan

For our Bronze Plan, HealthyFP charges a one-time fixed fee for a limited-scope HealthyPlan. We may request a portion of the fee be collected in advance, with the remainder due upon completion of the services. Fees are based on the type of relationship, as outlined in the table below:

Client Relationship Type	One-Time Fixed Fees
Single	\$3,000
Couple	\$4,000
Family	\$5,000
Business	\$8,000

For this service, fees are paid by electronic funds transfer or check, using an independent third-party payment processor in which the client can securely input their payment information. We do not have access to the client's payment information at any time. The client will be provided with their own secure portal in order to make payments.

Because this Plan is not an ongoing engagement, the engagement will automatically terminate upon completion of the services. However, clients may terminate earlier upon written notice. If services are terminated early, the client will be responsible for payment of services based on work already completed prior to termination. After deducting fees for services completed, fees paid in advance will be refunded promptly, if applicable. Any earned, unpaid fees will be due promptly.

### Silver | HealthyPlanning

With our Silver Plan, HealthyFP collects an upfront fee of no greater than \$4,000 for the construction and delivery of a comprehensive financial plan. This work will commence promptly after the fee is paid. The length of time required to complete and deliver the plan is dependent on several factors, including the needs of the client, their ability to provide any necessary information and documentation, as well as the complexity of their financial situation. We may reduce or waive the initial fee at our discretion.

Following delivery of the financial plan, HealthyFP charges an annual advisory fee assessed as either a fixed fee or a percentage of net worth, whichever is greater. Fees are paid monthly or quarterly in arrears. Net worth-based fees are calculated annually and are based on all year-end assets minus liabilities. Business interests, if applicable, are valued based on prior year's revenue. We will recalculate the fee annually at the beginning of each calendar year. The new fee will take effect upon the next billing cycle, upon client notification. Fees are outlined in the table below:

Client Relationship Type	Annual Advisory Fee	Net Worth-Based Fee
Single	\$4,200	Or 0.50%
Couple	\$5,400	
Family	\$6,600	
Business	\$10,000	

For this Plan, we may deduct our fee from one or more accounts held by a qualified custodian, as directed by the client. Please refer to [Item 15](#) below for more information regarding direct fee deduction. Clients may also pay by electronic funds transfer or check, using an independent third-party payment processor in which the client can securely input their payment information. We do not have access to the client's payment information at any time. The client will be provided with their own secure portal in order to make payments.

This service may be terminated with written notice at least 30 calendar days in advance. For any fees paid in advance, the final fee will be prorated based upon the percentage of the work done up to the date of termination and any unearned fees will be refunded to the client. For ongoing fees paid in arrears, the final fee will be prorated based on the number of days services are provided during the final billing period and the client will be responsible for payment of fees up to the date of termination.

## Gold | HealthyCFO

With our Gold Plan, HealthyFP collects an upfront fee of no greater than \$7,500 for the construction and delivery of a comprehensive financial plan. This work will commence promptly after the fee is paid. The length of time required to complete and deliver the plan is dependent on several factors, including the needs of the client, their ability to provide any necessary information and documentation, as well as the complexity of their financial situation. We may reduce or waive the initial fee at our discretion.

Following delivery of the financial plan, HealthyFP charges an annual advisory fee assessed as either a fixed fee or a percentage of net worth, whichever is greater. Fees are paid monthly or quarterly in arrears. Net worth-based fees are calculated annually and are based on all year-end assets minus liabilities. Business interests, if applicable, are valued based on prior year's revenue. We will recalculate the fee annually at the beginning of each calendar year. The new fee will take effect upon the next billing cycle, upon client notification. Fees are outlined in the table below:

Client Relationship Type	Annual Advisory Fee	Net Worth-Based Fee
Single	\$6,300	Or 0.70%
Couple	\$8,100	
Family	\$9,900	
Business	\$15,000	

For this Plan, we may deduct our fee from one or more accounts held by a qualified custodian, as directed by the client. Please refer to [Item 15](#) below for more information regarding direct fee deduction. Clients may also pay by electronic funds transfer or check, using an independent third-party payment processor in which the client can securely input their payment information. We do not have access to the client's payment information at any time. The client will be provided with their own secure portal in order to make payments.

This service may be terminated with written notice at least 30 calendar days in advance. For any fees paid in advance, the final fee will be prorated based upon the percentage of the work done up to the date of termination and any unearned fees will be refunded to the client. For ongoing fees paid in arrears, the final

fee will be prorated based on the number of days services are provided during the final billing period and the client will be responsible for payment of fees up to the date of termination.

## **Healthy | Hourly Services**

With our Healthy Plan, our hourly rate for limited-scope services is \$400. We may collect a portion of the fee in advance, depending on the estimated number of hours required to complete the engagement, with the remainder due upon completion of the services.

For this service, fees are paid by electronic funds transfer or check, using an independent third-party payment processor in which the client can securely input their payment information. We do not have access to the client's payment information at any time. The client will be provided with their own secure portal in order to make payments.

Because this Plan is not an ongoing engagement, the engagement will typically automatically terminate upon completion of the services. However, clients may terminate earlier upon written notice. If services are terminated early, the client will be responsible for payment of services based on work already completed prior to termination. After deducting fees for services completed, fees paid in advance will be refunded promptly, if applicable. Any earned, unpaid fees will be due promptly.

## **Tax Preparation Services**

For clients engaging our Silver and Gold Plans, we may offer tax preparation services to assist with the filing of federal and state tax returns for individuals and businesses, as determined on a case-by-case basis. Fees are based on the complexity of the client's state and federal returns (that is, the number and type of required forms and schedules and/or other circumstances). HealthyFP may waive fees for simple Form 1040 filings. The specific fees to be paid will be discussed with the client at the time of engagement.

Fees are due and payable upon acceptance by the client of the final tax returns. Fees are paid by electronic funds transfer or check, using an independent third-party payment processor in which the client can securely input their payment information. We do not have access to the client's payment information at any time. The client will be provided with their own secure portal in order to make payments.

Our tax preparation services typically automatically terminate upon delivery of the filing of the client's tax returns. However, clients may terminate earlier upon written notice. If services are terminated early, the client will be responsible for payment of services based on work already completed prior to termination. Any final fee will be prorated based on the extent of work completed relative to the overall scope of the client's tax filing.

## **Retirement Plan Services**

For our retirement plan services, HealthyFP may collect an initial fee, no greater than \$5,000. The initial fee is dependent upon variables such as the specific needs of the client, the complexity of their financial situation, and the estimated time, research, and resources required to provide services, among other factors we deem relevant. We may reduce or waive the initial fee at our discretion.

Additionally, HealthyFP charges an annual advisory fee of 0.50% of the client's assets under management, paid monthly or quarterly in arrears based on the average daily balance of the client's accounts. We rely on the valuation as provided by client's custodian in determining assets under management.

For this service, fees are either paid directly by the plan sponsor or deducted directly from the plan assets held by the custodian. Please refer to [Item 15](#) below for more information regarding direct fee deduction. Clients may also pay by electronic funds transfer or check, using an independent third-party payment processor in which the client can securely input their payment information. We do not have access to the

client's payment information at any time. The client will be provided with their own secure portal in order to make payments.

This service may be terminated with written notice at least 30 calendar days in advance. For any fees paid in advance, the final fee will be prorated based upon the percentage of the work done up to the date of termination and any unearned fees will be refunded to the client. For ongoing fees paid in arrears, the final fee will be prorated based on the number of days services are provided during the final billing period and the client will be responsible for payment of fees up to the date of termination.

### **Educational Workshops and Seminars Fees**

HealthyFP does not charge any fees for our educational workshops and seminars. The engagement for educational workshops and seminars will automatically terminate upon conclusion of the event.

### **Other Types of Fees and Expenses**

Our fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses. Clients may incur certain charges imposed by custodians, brokers, and other third-parties, such as custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire and electronic fund transfer fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange-traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Additionally, clients may incur fees from third-party professionals that HealthyFP recommends upon client request, such as accountants or attorneys. Such charges, fees, and commissions are exclusive of and in addition to our fee, and we shall not receive any portion of these costs.

Item 12 below further describes the factors that we consider in selecting or recommending custodians for clients' transactions and determining the reasonableness of their compensation (such as commissions).

We do not accept compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

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

We do not charge performance-based fees, which are fees based on a share of capital gains in client accounts. In addition, we do not engage in side-by-side management, which refers to the practice of simultaneously managing accounts that pay performance-based fees and those that do not.

### **Item 7: Types of Clients**

We generally provide financial planning, investment management, and tax preparation services to individuals (including high net worth individuals) and small businesses. Retirement plan services are provided to plan sponsors of qualified retirement plans. Educational workshops and seminars may be provided to individuals or organizations.

We do not require a minimum account size or minimum amount of investable assets to receive our services.

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

Below is a brief description of our methods of analysis and primary investment strategies.

## Methods of Analysis

### Fundamental Analysis

Fundamental analysis involves analyzing individual companies and their industry groups, such as financial statements, product line, experience and expertise of management, and outlook for the company's industry. The resulting data is used to measure the true value of the company's stock compared to the current market value and predict the company's future earnings. The risk of fundamental analysis is that the information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

### Modern Portfolio Theory

The underlying principles of Modern Portfolio Theory are:

- Investors are risk averse. The only acceptable risk is that which is adequately compensated by an expected return. Risk and investment return are related and an increase in risk requires an increased expected return.
- Markets are efficient. The same market information is available to all investors at the same time. The market prices every security fairly based upon this equal availability of information.
- The design of the portfolio as a whole is more important than the selection of any particular security. The appropriate allocation of capital among asset classes will have far more influence on long-term portfolio performance than the selection of individual securities.
- Investing for the long-term (preferably longer than ten years) becomes critical to investment success because it allows the long-term characteristics of the asset classes to surface.
- Increasing diversification of the portfolio with lower correlated asset class positions can decrease portfolio risk. Correlation is the statistical term for the extent to which two asset classes move in tandem or opposition to one another.

The primary risk associated with Modern Portfolio Theory is market risk, which is the possibility that an investment's value may decline due to overall market conditions. Market risk is common to all securities of the same general class (such as stocks and bonds) and, thus, cannot be eliminated by diversification.

### Mutual Fund and Exchange-Traded Fund Analysis

We look at the experience and track record of the manager of each mutual fund and exchange-traded fund ("ETF") in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We also look at the underlying assets in a fund to determine if there is significant overlap in the underlying investments held in other funds in the client's portfolio. In addition, we monitor the funds to determine if they are continuing to follow their stated investment strategy. A risk of mutual fund and ETF analysis is that, as in all securities investments, past performance does not guarantee future results. A manager who has been successful may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a fund, managers of different funds held by the client may purchase the same security, increasing the risk to the client if that security were to fall in value. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the fund, which could make the fund less suitable for the client's portfolio.

## **Investment Strategies**

### **Asset Allocation**

Asset allocation is a strategy to help mitigate risk that involves distributing investments across various asset classes, sectors, and industries to balance risk and return. In implementing a client's investment strategy, we select an asset allocation suitable to the client's investment goals, time horizon, and risk tolerance. A risk of asset allocation is that the client may not participate in sharp increases in a particular security, industry, or market sector. Additionally, the ratio of assets will change over time due to stock and market movements and, if not corrected, the allocations may no longer be appropriate for the client's goals. We attempt to closely monitor our asset allocation models and make changes periodically to keep them in line with the client's strategy and target risk tolerance model.

### **Passive and Active Investment Management**

We may choose investment vehicles that are considered passive, active, or a combination of both styles. We strive to construct portfolios of funds and individual securities that we believe will have the greatest probability for achieving our clients' personal financial goals with the least amount of volatility and risk, rather than attempt to outperform an arbitrary index or benchmark.

Passive investment management involves building portfolios that are composed of various distinct asset classes. The asset classes are weighted in a manner to achieve a desired relationship between correlation, risk, and return. Funds that passively capture the returns of the desired asset classes, typically mutual funds or exchange-traded funds, are placed in the portfolio. Passive investing is characterized by low portfolio expenses (that is, the funds inside the portfolio have low internal costs), minimal trading costs (due to infrequent trading activity), and relative tax efficiency (because the funds inside the portfolio are tax efficient and turnover inside the portfolio is minimal). Risks of passive investing include limited responsiveness to short-term market fluctuations or economic shifts, potential underperformance relative to actively managed strategies in certain market conditions, and exposure to broad market declines that affect entire asset classes.

In contrast, active investment management involves the employment of some method, strategy, or technique to construct a portfolio that is intended to generate returns that are greater than the broader market or a designated benchmark. Actively managed funds are also designed to reduce volatility and risk. Risks of active investing include higher costs due to more frequent trading and management fees, greater tax inefficiency, and the possibility that active strategies may fail to outperform the market or benchmark, particularly after expenses are considered.

While we may engage in both passive and active investing in a client's portfolio, specific investment selections are based on a number of factors that we evaluate in order to select, what we believe to be, the highest quality funds or individual securities for our clients. These factors include, but are not limited to, underlying holdings of funds, percentage weighting of holdings within funds, liquidity, tax efficiency, bid/ask spreads, and other smart or strategic beta factors. These factors may or may not result in the lowest cost exchange-traded funds and mutual funds available, but we strive to keep internal fund expenses as low as possible.

### **Socially Responsible Investing**

With socially responsible investment approaches, HealthyFP constructs portfolios that utilize mutual funds, exchange-traded funds, or individual securities with the purpose of incorporating socially conscious principles into a client's portfolio. This allows our clients to invest in a way that aligns with their personal values. We may rely on mutual funds and exchange-traded funds that incorporate environmental, social, and governance ("ESG") research, as well as positive and negative screens related to specific business practices, to determine the quality of an investment on values-based merits. Additionally, we may construct

portfolios with individual securities, using third-party research to determine socially conscious considerations.

If you request 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 limited and, due to this limitation, there is a probability of similarity or overlap of holdings, especially among socially conscious mutual funds or exchange-traded funds. 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.

## **Long-Term and Short-Term Trading**

Long-term trading is designed to capture market rates of both return and risk. As such, we typically purchase securities and hold them in the client's portfolio for a year or longer. A risk in a long-term purchase strategy is that by holding the security for this length of time, we may not take advantage of short-term gains that could be profitable to a client. Additionally, due to its nature, the long-term investment strategy can expose investment portfolios to various types of risk that will typically surface at various intervals, such as inflation, interest rate, or market risk.

Short-term trading may be employed, as appropriate, when we believe securities to be undervalued or want exposure to a particular asset class over time, regardless of the current projection for this class. Short-term trading involves frequent buying and selling of securities, which can lead to increased transaction costs, higher tax liabilities due to ordinary income treatment, and exposure to market timing risks. This strategy often relies on the ability to predict short-term price movements, which is inherently uncertain. Moreover, if our predictions are incorrect, a security may decline sharply in value before we make the decision to sell.

## **Risk of Loss**

All investments involve risk and may result in a loss of your original investment, which you should be prepared to bear. While there is risk in all investments, some carry a greater degree of risk or higher costs. There is no guarantee your investment strategy will result in your goals being met, nor is there any guarantee of profit or protection from loss. Where applicable, we encourage you to read the fund prospectus or other investment offering documents to fully understand the risks associated with each investment.

## **General Risks**

General risks associated with investing include, but are not limited to, the below:

- **Market Risk:** Market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the value of the investment, regardless of the operational success of the issuer's operations or financial condition.
- **Concentration Risk:** Certain investment strategies focus on particular asset classes, industries, sectors, or types of investment. From time to time these strategies could be subject to greater risks of adverse developments in such areas of focus than a strategy that is more broadly diversified across a wider variety of investments.
- **Inflation Risk:** Inflation may erode the buying power of your investment portfolio, even if the dollar value of your investments remains the same.
- **Interest Rate Risk:** Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true, and bond prices generally rise when interest rates fall. In general, fixed income securities with longer maturities

are more sensitive to these price changes. Most other investments are also sensitive to the level and direction of interest rates.

- **Legal or Legislative Risk:** Legislative changes or court rulings may impact the value of investments or securities' claim on the issuer's assets and finances.
- **Limited Markets Risk:** Certain securities may be less liquid (that is, harder to sell or buy) and their prices may at times be more volatile than at other times. Under certain market conditions, it could be difficult to sell or liquidate investments at prices considered reasonable or favorable or find buyers at any price.
- **Small and Medium Cap Company Risk:** Market capitalization ("cap") is the total value of a company's outstanding shares of stock, which is used to determine a company's size and overall value in the stock market. Securities of companies with small and medium market cap are often more volatile and less liquid than investments in larger companies. Small and medium cap companies may face a greater risk of business failure, which could increase the volatility of an investment portfolio.
- **Strategy Risk:** Investment strategies or techniques may not work as intended.
- **Turnover Risk:** At times, an investment strategy could have a portfolio turnover rate that is higher than other strategies. A high portfolio turnover would result in correspondingly higher transaction costs and could result in the distribution of additional capital gains for tax purposes. These factors may negatively affect the portfolio's performance.

## Investment-Specific Risks

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

- **Cash and Cash Equivalents:** Cash and cash equivalents (such as money market funds and short-term deposits) are generally used to meet liquidity needs and reduce portfolio volatility. While these investments typically involve lower market risk than longer-term securities, they are subject to inflation risk, meaning returns may not keep pace with rising prices and purchasing power may decline over time. Cash equivalents may also be subject to interest rate risk and credit risk depending on the underlying instrument (for example, deposits at a financial institution or the holdings within a money market fund). In low interest rate environments, cash and cash equivalents may generate minimal returns and may limit overall portfolio growth.
- **Corporate Bonds:** Corporate bonds are a way for companies to borrow money from investors. When you buy a corporate bond, the company agrees to pay you interest regularly and return the borrowed amount either in installments or all at once when the bond matures. Some bonds, like zero-coupon bonds, do not pay interest over time. Instead, they are sold at a lower price than their face value, and their value gradually increases until they reach full value at maturity. The price of bonds can change based on factors like interest rates, the company's financial health, and how long until the bond matures. Generally, bond prices go down when interest rates go up and rise when interest rates fall. Bonds with longer periods until maturity are more sensitive to changes in interest rates.
- **Exchange-Traded Funds:** Exchange-traded funds ("ETFs") are investment funds that hold a mix of securities, like stocks or bonds, to mirror the performance of a specific market index or commodity. They can track things like stock indexes, industries, bonds, or precious metals. Some ETFs simply follow an index, while others are actively managed. While many ETFs are straightforward, some use complex strategies that may be harder to understand. The value of ETFs can fluctuate based on market conditions, and they are subject to the same risks as the assets they track, such as market volatility or interest rate changes. Some ETFs may have low trading volume, making them harder to buy or sell

shares at a desirable price. Actively managed or leveraged ETFs may carry additional risks, including higher costs and more unpredictable price movements.

- **Municipal Bonds:** Municipal bonds are debt obligations generally issued to obtain funds for various public purposes, including the construction of public facilities. Municipal bonds pay a lower rate of return than most other types of bonds. However, because of their tax-favored status, investors should compare the relative after-tax return to the after-tax return of other bonds, depending on the investor's tax bracket. Investing in municipal bonds carries the same general risks as investing in fixed income securities in general, such as interest rate, inflation, market, call or redemption, credit, liquidity, and valuation risks.
- **Mutual Funds:** Mutual funds are pooled investment vehicles, including money market instruments, stocks, bonds, or other investments. Professional money managers research, select, and monitor the performance of the securities the fund purchases. It is easier to achieve diversification through ownership of mutual funds than through ownership of individual stocks or bonds. Even with no-load or load-waived funds, there are mutual fund expenses paid to the fund company. Investors could have to pay taxes on capital gains distributions received by the fund but not distributed to the investor. Mutual funds are subject to market risk, meaning their value can rise or fall based on overall market conditions.
- **Stocks:** Stock represents ownership of a company. If the company prospers and grows, the value of the stock should increase. Even if a company is profitable, the stock prices are subject to market risk, which is attributable to investor attitudes. Stock ownership in more established companies is more conservative, while younger companies provide the most risk and reward opportunities.
- **U.S. Government Securities:** U.S. government securities (such as U.S. Treasury bills, notes, and bonds) are generally considered among the lowest credit-risk fixed income investments because they are backed by the U.S. government. However, they remain subject to interest rate risk (that is, as interest rates rise, the market value of existing securities typically declines) and inflation risk (which can reduce the real value of interest and principal payments over time). Longer-maturity government securities generally experience greater price fluctuations than shorter-term securities. Certain government-related securities (such as agency or government-sponsored enterprise obligations) may carry additional risks, including differing levels of government support, prepayment risk, and liquidity risk.

## **Item 9: Disciplinary Information**

As a registered investment adviser, HealthyFP is required to disclose material facts about any legal or disciplinary event that could be material to your evaluation of our advisory business or the integrity of our management personnel. We have not been involved in any criminal or civil action, administrative enforcement proceedings, or self-regulatory organization proceedings. We do not have any legal or disciplinary events regarding our firm or our management personnel to disclose.

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

### **Other Affiliations**

Neither HealthyFP nor any of our management personnel are registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer. In addition, neither our firm nor any of our management personnel are registered, or have an application pending to register, as a futures commission merchant, commodity pool operator, commodity trading advisor, or associated person of the foregoing entities.

HealthyFP does not recommend or select other investment advisers for our clients.

Based on the services you need, we could recommend that you use an unaffiliated registered broker-dealer as the qualified custodian and broker for your accounts. We have established relationships with custodians to help facilitate our management of client accounts. Further information regarding these custodial relationships is provided in Item 12 below.

## **Other Activities**

Robert (“Bob”) Wolfe, the firm’s principal, is dually-registered as an investment adviser representative of NewRetirement Advisors, LLC, doing business as Boldin Advisors. In this capacity, he provides investment advisory, tax planning, and financial planning services to clients of Boldin Advisors. He is compensated for this activity and spends approximately 30% of his time per month in this capacity.

Bob is also employed with Rooker Consulting Services LLC, doing business as Grad Loan Advice. In this capacity, he provides student loan consulting services. At times, he may refer clients between HealthyFP and Grad Loan Advice, when appropriate, but he will not receive any compensation in exchange for the referral. Clients are never obligated to use the services of either party recommended to them. He is compensated for this activity and spends approximately 5% of his time per month in this capacity.

Additionally, Bob provides pro bono advisory services at the non-profit organization Advisors Give Back, Inc. He is not compensated for this activity and spends less than 5% of his time per month on this work.

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

### **Code of Ethics**

As a fiduciary, our firm has a duty of utmost good faith to act solely in the best interests of each client. Our clients entrust us with their funds and personal information, which in turn places a high standard on our conduct and integrity. As such, we have adopted a formal Code of Ethics to govern our business practices, which includes policies regarding standards of professional conduct, conflicts of interest, insider trading, and personal securities trading.

Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all of our dealings. The firm also adheres to the *Code of Ethics and Standards of Conduct* adopted by the Certified Financial Planner Board of Standards, Inc. Additionally, we accept the obligation not only to comply with the mandates and requirements of all applicable laws and regulations, but also to act in an ethical and professionally responsible manner in all professional services and activities.

This Code of Ethics does not attempt to identify all possible conflicts of interest, and compliance with each of its specific provisions will not shield our firm or supervised persons from liability for misconduct that violates a fiduciary duty to our clients. A summary of the Code of Ethics’ principles is outlined below:

- **Integrity:** Supervised persons shall offer and provide professional services with integrity.
- **Objectivity:** Supervised persons shall be objective in providing professional services to clients.
- **Competence:** Supervised persons shall provide services to clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which they are engaged.
- **Fairness:** Supervised persons shall perform professional services in a manner that is fair and reasonable to clients and shall disclose conflicts of interest in providing such services.
- **Confidentiality:** Supervised persons shall not disclose confidential client information without the specific consent of the client, unless in response to proper legal process or as required by law.

- **Professionalism:** Supervised persons' conduct in all matters shall reflect the credit of the profession.
- **Diligence:** Supervised persons shall act diligently in providing professional services.

We periodically review and amend our Code of Ethics to ensure that it remains current, and we require all supervised persons to attest to their understanding of and adherence to the Code of Ethics at least annually. Our firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

## **Recommendations Involving Conflicts of Interest**

Neither our firm, our supervised persons, or any related person is authorized to recommend to a client or effect a transaction for a client involving any security in which our firm or a related person has a material financial interest, such as in the capacity as an underwriter or adviser to the issuer, among others. We do not engage in principal or agency cross transactions.

## **Purchases of Securities Recommended to Clients**

Our firm and supervised persons may buy or sell securities the same as, similar to, or different from those we recommend to clients. Such transactions could be executed at or around the same time as client transactions. Investing securities in which clients also invest presents a potential conflict of interest. In an effort to reduce or eliminate certain conflicts of interest, our Code of Ethics requires our firm and supervised persons to place client interests ahead of their own in all investment decisions and prohibits trading in a manner that disadvantages clients. Further, we could restrict or prohibit certain transactions in the accounts of our firm or supervised persons. Any exceptions or trading pre-clearance must be approved by HealthyFP's Chief Compliance Officer in advance. The Chief Compliance Officer also reviews and maintains copies of access persons' personal securities transactions and holdings as required by our Code of Ethics and securities regulations.

## **Item 12: Brokerage Practices**

### **Factors Used to Select Custodians**

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

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody);
- Capability to execute, clear, and settle trades (that is, buy and sell securities for your account);
- Capability to facilitate transfers and payments to and from accounts (such as wire transfers, check requests, and bill payment);
- Breadth of available investment products (such as stocks, bonds, mutual funds, and exchange-traded funds);
- Availability of investment research and tools that assist us in making investment decisions;
- Quality of services;
- Competitiveness of the price of those services (such as commission rates, margin interest rates, and other fees) and willingness to negotiate the prices;

- Reputation, financial strength, security, and stability; and
- Prior service to us and our clients.

With this in consideration, our firm recommends Altruist Financial LLC (“Altruist”) and Charles Schwab & Co., Inc. (“Schwab”), independent and unaffiliated broker-dealer firms and members of the Financial Industry Regulatory Authority (“FINRA”) and the Securities Investor Protection Corporation (“SIPC”). We have determined that trading our clients’ accounts through a preferred custodian is consistent with our firm’s obligation to seek best execution of client trades. We regularly review and consider the overall quality and price of the services received from our preferred custodians in light of our duty to seek best execution.

## **Recommended Custodians**

### **Altruist and Schwab**

Our firm is not affiliated with any broker-dealers. Specific custodian recommendations are made to clients based on their need for such services. We recommend custodians based on the reputation of and services provided by the firm.

For clients engaging our investment management services, we have established relationships with Altruist and Schwab and require that you use one of these custodians to facilitate our management of your accounts. If you do not wish to place your assets with one of the custodians with which we have an established relationship, we cannot manage your account. We can assist with establishing your accounts at Altruist or Schwab, but we do not have the authority to open accounts on your behalf.

These custodians will hold your assets in a separate brokerage account and will buy and sell securities when we or you instruct them. We execute client transactions directly with the custodian that holds the client’s account, and we do not permit clients to direct us to execute transactions through a specific broker-dealer. Not all investment advisers require their clients to use their recommended custodian. By requiring that clients use Altruist or Schwab, we may be unable to achieve most favorable execution of client transactions, and this practice may cost clients more money. However, we will only recommend custodians if we believe it is in the best interests of our clients.

### **Flourish Cash**

Additionally, HealthyFP offers a cash management aggregator system named Flourish Cash. Flourish Cash is a service offered by an unaffiliated third-party, Flourish Financial LLC. A Flourish Cash account is a brokerage account whereby the cash balance is swept from the brokerage account to deposit accounts at one or more third-party banks that have agreed to accept deposits from customers of Flourish Cash. Flourish Financial LLC is a wholly-owned subsidiary of Massachusetts Mutual Life Insurance Company. Please refer to the applicable disclosures provided separately by Flourish Financial LLC at account opening.

## **Research and Other Soft Dollar Benefits**

We do not have any soft dollar arrangements with custodians, whereby soft dollar credits, used to purchase products and services, are earned directly in proportion to the amount of commissions paid by our clients. However, as a result of being on their institutional platform, Altruist and Schwab may provide us with certain services and benefits, provided without cost or at a discount, which might not be available to retail clients. These benefits include access to certain investment options; execution of securities transactions; custodial services; access to an electronic trading platform; the ability to deduct our advisory fee from client accounts; access to client account data; receipt of duplicate trade confirmations and account statements; research-related products and tools; pricing and market data; access to software, technology, or other services; attendance at educational conferences and events; consulting on technology, compliance, or other

business matters; and access to industry publications. Some of these products and services could benefit you directly, while others could benefit us by assisting us in the administration of our business and the management of client accounts.

The benefits received do not depend on the number or value of brokerage transactions directed to the custodian. These services are available to all advisers who participate in the custodial programs and are not provided in exchange for us directing client trades to the custodian. We do not direct client trades to a particular broker; all transactions are executed through the custodian that holds the client's account. Therefore, the services and benefits that we receive from these custodians are not considered soft dollar arrangements. Clients should be aware, however, that the receipt of benefits from custodians creates a potential conflict of interest, as we may have an incentive to recommend you maintain your account with Altruist or Schwab. We attempt to mitigate this conflict of interest by regularly reviewing the factors used to select custodians to ensure our recommendations are appropriate. As part of our fiduciary duties to clients, we must at all times put the interests of our clients first.

## **Brokerage for Client Referrals**

We do not receive client referrals from any custodian or broker-dealer.

## **Order Aggregation**

Investment advisers can elect to purchase or sell the same securities for several clients at approximately the same time when they believe such action could be advantageous to clients. This process is referred to order aggregation, batch trading, or block trading. We do not engage in order aggregation. It should be noted that implementing trades on an aggregate basis could be less expensive for client accounts. However, it is our trading policy to implement all client orders on an individual basis. Considering the types of investments we hold in client accounts, we do not believe clients are hindered in any way because we trade accounts individually. This is because we develop individualized investment strategies for clients and holdings will vary. Our strategies are primarily developed for the long-term and minor differences in price execution are not material to our overall investment strategy.

## **Item 13: Review of Accounts**

### **Financial Planning Services**

Robert Wolfe, Founder and Chief Compliance Officer of HealthyFP, will work with clients to obtain current information regarding their financial situation and will review this information as part of our financial planning services. We will review the financial plan and the client's progress towards goals or our recommendations at least annually for our Silver Plan and at least quarterly for our Gold Plan. Additionally, on an annual basis, we will update the financial plan to reflect the client's financial situation, desired goals, and anticipated future needs. HealthyFP does not provide specific reports to clients, other than financial plans.

With our Bronze and Healthy Plans, we typically do not provide any ongoing review, monitoring, or reporting.

### **Investment Management Services**

Clients who engage our Silver and Gold Plans will receive ongoing investment management services and will have their accounts reviewed on at least an annual basis by Robert Wolfe, Founder and Chief Compliance Officer. Accounts are reviewed with regard to the client's investment objectives and risk tolerance levels and to ensure the applied investment strategy remains appropriate. Events that may trigger an additional review would be significant market events, unusual performance, additions or deletions of client-imposed restrictions, excessive withdrawals, volatility in performance, or buy and sell decisions from the firm or per the client's needs.

Clients will receive monthly or quarterly statements and annual tax reporting statements from their custodian showing all activity in the accounts, such as receipt of dividends and interest. HealthyFP does not provide written performance or holdings reports to clients outside of what is provided directly by their custodian.

## **Tax Preparation Services**

With our tax preparation services, we typically do not provide any ongoing review, monitoring, or reporting.

## **Retirement Plan Services**

For our retirement plan services, our obligation to provide ongoing review, monitoring, or reporting will be as agreed to between us and the plan sponsor and as outlined in the advisory agreement.

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

HealthyFP does not receive commissions or other sales-related compensation. Except as mentioned in [Item 12](#) above, 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.

The firm occasionally posts content on its YouTube channel and participates in the AdSense for YouTube program, through which content creators receive income from advertisements on their videos. This revenue is not paid by advisory clients and is not tied to specific client transactions. The content on the firm's YouTube channel is for educational purposes only.

## **Item 15: Custody**

HealthyFP does not accept physical custody of client funds or securities, nor do we have any authority to obtain possession of them. All client assets are held by a qualified custodian. However, as explained below, we could be deemed to have limited custody when we directly debit our advisory fees from client accounts or if we are able to initiate transactions from client accounts to third-parties using a standing letter of authorization.

### **Deduction of Investment Advisory Fees**

Under applicable securities regulations, we are deemed to have custody of client funds or securities if we deduct our investment advisory fee directly from clients' accounts. In such cases, the following safeguards will be applied:

- The client will provide written authorization to HealthyFP, permitting us to be paid directly from their accounts held by the custodian.
- The custodian will send at least quarterly statements to the client showing all disbursements from the accounts, including the amount of the fee deducted.
- In jurisdictions where required, HealthyFP will send an itemized invoice to the client prior to or at the same time we instruct the custodian to debit the fee. Itemization includes the formula used to calculate the fee, amount of assets under management the fee is based on, and time period covered by the fee.

We urge you to carefully review custodial statements and compare them to the account invoices we may provide to you and notify us of any discrepancies. Our invoices may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

## **Standing Letters of Authorization**

Qualified custodians offer clients the ability to establish a standing letter of authorization (“SLOA”) that allows their adviser to initiate transfers between client accounts at the same custodian, to initiate transfers to external accounts, or to request checks to be distributed from the client’s account. These transactions can be first-party transactions (that is, transfers between internal or external accounts with the same account holder or checks distributed to the client at their address of record) or third-party transfers (that is, transfers or checks to other parties).

Under applicable securities regulations, advisers are considered to have custody of client funds and securities if the adviser has the ability to initiate transfers from client accounts to third-parties under a SLOA. However, an adviser is not deemed to have custody in the event of a first-party transfer. As a matter of policy, we do not allow SLOAs for third-party transfers, but we can facilitate first-party transfers upon proper client authorization.

## **Item 16: Investment Discretion**

### **Financial Planning Services**

Recommendations provided under our financial planning services made with regard to accounts for which we do not provide investment management services are made on a non-discretionary basis. Clients are responsible for initiating any transactions necessary to implement our recommendations.

### **Investment Management Services**

For client accounts for which we provide investment management services, HealthyFP has discretionary authority to determine the securities and the amount of securities to be bought or sold without having to obtain prior client approval for each transaction. However, these transactions are subject to the investment strategy for the client. Investment discretion is explained to clients in detail when an advisory relationship has commenced. At the start of the relationship, the client will execute a limited power of attorney, which will grant our firm discretion over the accounts. Additionally, the discretionary relationship will be outlined in the advisory agreement signed by the client. Clients may limit our discretion by requesting certain restrictions on investments. However, approval of such requests are at our discretion.

### **Retirement Plan Services**

For our retirement plan services, HealthyFP’s discretionary authority is agreed to in advance and outlined in the advisory agreement signed by the client. If we do not have discretionary authority, we will make recommendations to the plan sponsor and the plan sponsor retains discretionary authority and/or control over plan assets. Where we are granted discretionary authority, as defined in ERISA Section 3(38), we have sole discretion for making the final selection of funds available to plan participants and for reviewing, monitoring, removing, and replacing investment fund options.

## **Item 17: Voting Client Securities**

We do not accept voting authority for securities held in client investment accounts. Therefore, clients maintain exclusive responsibility for voting proxies and acting on corporate actions pertaining to their investment assets. The client shall instruct the custodian to forward to them copies of all proxies and shareholder communications relating to their investment assets. In most cases, clients will receive proxy materials directly from the custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to the client by mail or email, as depending on if we are

authorized to contact the client electronically. If the client has any questions on a particular proxy vote, they may contact us (215) 510-7597.

## **Item 18: Financial Information**

We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to our clients, nor have we been the subject of any bankruptcy proceeding. We do not have custody of client funds or securities, except as disclosed in [Item 15](#) above, nor do we require or solicit prepayment of more than \$1,200 in fees six months or more in advance. Therefore, we are not required to include our balance sheet in this section.

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

Robert Wolfe serves as HealthyFP's sole principal, Chief Executive Officer, and Chief Compliance Officer. Information about his formal education, business background, and outside business activities can be found in his [Form ADV Part 2B \("Brochure Supplement"\)](#) attached to this Firm Brochure.

All outside business information, if applicable, of HealthyFP is disclosed in [Item 10](#) of this Brochure.

Neither HealthyFP nor any of our supervised persons are compensated for advisory services with performance-based fees.

Neither HealthyFP nor any of our supervised persons have ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Neither HealthyFP nor any of our supervised persons have any relationship or arrangement with issuers of securities.



## Form ADV Part 2B – Brochure Supplement

1801 Butler Pike, #238

Conshohocken, PA 19428

(215) 510-7597

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

January 30, 2026

### **Robert Wolfe**

*Founder, Owner, Chief Executive Officer, and Chief Compliance Officer*

#### **Item 1: Cover Page**

This Brochure Supplement provides information about Robert Wolfe that supplements the Firm Brochure for wHealthyFP LLC, doing business as HealthyFP. You should have received a copy of that Brochure. Please contact Robert Wolfe if you did not receive HealthyFP's Firm Brochure or if you have any questions about the contents of this Brochure Supplement.

Additional information about Robert Wolfe is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov), which can be found using his identification number 6788314.

## Item 2: Educational Background and Business Experience

### Robert ("Bob") P. Wolfe

- **CRD Number:** 6788314
- **Born:** 1996

### Educational Background

- **William Patterson University:** Bachelor of Science, Financial Planning – 2019

### Business Experience

- **wHealthyFP LLC, doing business as HealthyFP:** Founder, Owner, Chief Executive Officer, and Chief Compliance Officer – 4/2025 to Present
- **NewRetirement Advisors, LLC, doing business as Boldin Advisors:** Financial Advisor – 9/2025 to Present
- **Rooker Consulting Services LLC, doing business as Grad Loan Advice:** Student Loan Consultant – 7/2025 to Present
- **WealthFD LLC:** Senior Wealth Advisor – 10/2022 to 4/2025
- **RegentAtlantic Capital, LLC:** Associate Wealth Advisor – 2/2020 to 10/2022
- **Wealth Enhancement Group, Inc.:** Associate Financial Planner – 10/2019 to 2/2020
- **American Economic Planning Group Inc., doing business as AEPG Wealth Strategies:** Associate Financial Planner – 5/2017 to 10/2019

### Professional Designations and Licenses

- **CERTIFIED FINANCIAL PLANNER®:** The CERTIFIED FINANCIAL PLANNER® ("CFP®") designation is granted by the Certified Financial Planner Board of Standards, Inc. ("CFP Board") to individuals who meet rigorous professional standards in financial planning. It is a voluntary certification recognized for its emphasis on education, examination, experience, and ethics. To become a CFP® professional, an individual must: complete a college-level program in financial planning and attain a bachelor's degree from an accredited institution; pass the CFP® Certification Examination, which assesses the application of financial planning knowledge in real-life scenarios; accumulate at least three years of full-time financial planning experience (or the equivalent, measured as 2,000 hours per year); and agree to be bound by the CFP Board's *Code of Ethics and Standards of Conduct* ("Code and Standards"), which sets forth the ethical and practice standards for CFP® professionals. To maintain their certification, CFP® professionals must: complete 30 hours of continuing education every two years, including ethics training, and renew their commitment to the *Code and Standards* and their fiduciary obligations. CFP® professionals who fail to comply with these requirements could be subject to the CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification. For more information, refer to the CFP Board website: [www.cfp.net](http://www.cfp.net).
- **Certified Student Loan Professional:** The Certified Student Loan Professional ("CSLP®") is a professional certification awarded by the CSLA Institute Board of Standards ("CSLA Institute"). Candidates for the CSLP® certification must have an active financial license, such as a CERTIFIED FINANCIAL PLANNER® ("CFP®"), Certified Public Accountant ("CPA"), Enrolled Agent ("EA"), Chartered Financial Consultant® ("ChFC"), Chartered Financial Analyst® ("CFA®"), or state insurance license. They must also complete online, self-paced coursework, which provides a foundation in student

loan repayment, forbearance, and default. The coursework is comprised of four modules, each of which requires a final module certification exam. Candidates must also pass a final online, proctored certification exam. To maintain the certification, CSLP® professionals must pass an annual renewal exam. For more information, refer to the CSLA Institute website: [www.cslainstitute.org/the-cslp-program](http://www.cslainstitute.org/the-cslp-program).

- **Enrolled Agent:** An Enrolled Agent ("EA") is a tax professional authorized by the United States government to represent taxpayers in matters regarding the Internal Revenue Service ("IRS"). EAs may become credentialed in two different ways: through the successful completion of the three-part Special Enrollment Exam ("SEE") or with five years of IRS experience regularly interpreting tax regulations. EA candidates must also pass a background check before they are granted the EA credential. To maintain the EA credential, individuals must adhere to ethical standards and complete 72 hours of continuing education courses every three years. For more information, refer to the IRS website: [www.irs.gov/tax-professionals/enrolled-agents/enrolled-agent-information](http://www.irs.gov/tax-professionals/enrolled-agents/enrolled-agent-information).

## **Item 3: Disciplinary Information**

Bob Wolfe has never been involved in an arbitration claim of any kind and has never been found liable in any criminal or civil actions, self-regulatory organization proceeding, administrative proceeding, or other hearings or formal adjudications.

## **Item 4: Other Business Activities**

Bob Wolfe is dually-registered as an investment adviser representative of NewRetirement Advisors, LLC, doing business as Boldin Advisors. In this capacity, he provides investment advisory, tax planning, and financial planning services to clients of Boldin Advisors. He is compensated for this activity and spends approximately 30% of his time per month in this capacity.

Bob is also employed with Rooker Consulting Services LLC, doing business as Grad Loan Advice. In this capacity, he provides student loan consulting services. At times, he will refer clients between HealthyFP and Grad Loan Advice, when appropriate, but he will not receive any compensation in exchange for the referral. Clients are never obligated to use the services of either party recommended to them. He is compensated for this activity and spends approximately 5% of his time per month in this capacity.

Additionally, Bob provides pro bono advisory services at the non-profit organization Advisors Give Back, Inc. He is not compensated for this activity and spends less than 5% of his time per month on this work.

## **Item 5: Additional Compensation**

As owner of HealthyFP, Bob Wolfe receives economic benefit from the overall profitability of the firm, but he does not receive any additional compensation from non-clients for providing advisory services.

## **Item 6: Supervision**

Bob Wolfe, as owner and Chief Compliance Officer of HealthyFP, is responsible for supervision of our firm. Supervision is administered through the application of and adherence to written policies and procedures, including a Code of Ethics. He may be contacted at (215) 510-7597.

## **Item 7: Requirements for State-Registered Advisers**

Bob Wolfe has never been involved in an arbitration, civil proceeding, self-regulatory organization proceeding, administrative proceeding, or bankruptcy petition.